



**Veeco Instruments Inc.**  
**Human Rights Policy**

Veeco's Human Rights Policy formalizes the Company's commitment to preserving and promoting the fundamental rights of others as reflected in the Responsible Business Alliance (RBA) Code of Conduct. Our commitment to international human rights standards and local laws are rooted in our core values and reinforced through our commitment to the Veeco and RBA Codes of Conduct and other Company policies. This policy applies to all Veeco employees, major suppliers, select service providers and contractors and products and services.

**LABOR**

Veeco is committed to upholding the human rights of workers and to treating them with dignity and respect as understood by international standards. This commitment not only applies to all Veeco employees, but to all temporary, student, intern, contract or any other type of worker that may work to support Veeco (collectively "worker(s)").

**1. Diversity and Non-Discrimination**

As a Company, Veeco promotes an inclusive environment and celebrates our differences. We are committed to maintaining a workplace free from all forms of discrimination. We do not engage in, and will not tolerate, any form of discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status or any other characteristic provided by applicable law. We believe that diversity supports a culture of inclusion and belonging and celebrates differences in ideas, belief systems, backgrounds, experiences, demographics, cultures, attitudes and communication styles. Veeco workers are provided with reasonable accommodations for religion practices and they are never subjected to medical tests or physical exams that could be used in a discriminatory way. Our diversity makes us a stronger Veeco.

**2. Anti-harassment**

We are committed to providing a work environment free from inappropriate and unlawful discrimination and harassment of any kind. We promote a safe and productive workplace free from sexual, physical, verbal and psychological harassment based on, but not limited to, race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status or any other characteristic provided for by applicable law.

**3. Freely Chosen Employment: Prevention of Human Trafficking and Forced Labor**

The use of forced labor, bonded labor, indebted labor, indentured labor, involuntary prison labor, slavery or human trafficking within our own operations or those of our supply chain is strictly forbidden. As part of our hiring process, workers are provided a written employment agreement or offer letter that contains a description of the terms and conditions of employment, including clearly stated compensation and benefits. All work is voluntary, and workers are free to leave Veeco at any time. We will not hold or otherwise confiscate, conceal, destroy, or deny workers access to their identification or immigration documents. Workers shall not be required to pay recruitment fees or other related fees for their employment. Our employees and other stakeholders are encouraged to

report any concerns they may have on human trafficking through our Veeco Hotline at 1-888-419-0572 and [veeco.alertline.com](http://veeco.alertline.com).

#### **4. Child Labor Prevention**

Veeco will never use child labor and we will only employ workers who, before their first day of employment, have attained at least 18 years of age or are older than the local legal minimum age for employment, whichever is greater. We expect the same of our labor agencies and suppliers.

#### **5. Minimum Wage and Working Hours**

We pay wages at or above the legally mandated minimum wage requirements, including the legal overtime rate for employees. Employees are also entitled to, at a minimum, legally mandated benefits and are not required to pay fees, deposits or incur debt as a result of employment. We will comply, in each of the locations where we employ workers, with the applicable laws and rules that govern the hours of work for our employees together with relevant industry practices and employee wellness and general safety considerations.

#### **6. Humane Treatment**

There will never be harsh or inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor will there be a threat of this kind of treatment.

#### **7. Freedom of Association**

In accordance with local laws, we recognize the freedom of workers to establish or join an organization of their choosing, to bargain collectively, to engage in peaceful assembly, or to refrain from such activities. We respect the right of our workers to associate without fear of pressure, retaliation or reprisal. We also encourage open communication on work-related topics, guidance or concerns with their immediate managers, department heads, country or regional managers, human resources, legal representatives or a member of the Veeco executive leadership team.

#### **8. Worker Time Reporting and Approvals**

Veeco workers enter, review, and submit for approval the hours they work for each pay period. Workers complete this process in a language they understand.

### **ENVIRONMENTAL & WORKPLACE HEALTH and SAFETY**

Veeco recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment is important to product and services quality, production consistency, and worker morale. Veeco also recognizes our responsibility to the environment and we are committed to minimizing adverse effects on the community and natural resources while safeguarding the health and safety of our workers and the public. Key aspects of Veeco's environmental, health and safety policies are summarized below; see Veeco's Environmental & Social Responsibility Statement for additional details.

#### **1. Workplace Safety**

We respect the health and safety of our workers, customers, suppliers and the communities where we operate. We are dedicated to providing a safe and healthy workplace by complying, at a minimum, with local requirements and developing programs that strengthen our safety culture and prevent unsafe conditions and acts. This is consistent with our global Environmental, Health, and Safety (EH&S) Policy Statement.

## **2. Environmental Stewardship**

We work to promote a greener world through our operations by consuming less energy and water, decreasing waste and reducing emissions. This is consistent with our global Environmental, Health, and Safety (EH&S) Policy Statement.

## **3. Product Responsibility**

We take steps to ensure that individuals manufacturing or using our products are free from health and safety hazards and that the materials used in our products are ethically sourced. Suppliers of Veeco must ensure that all materials used in the manufacturing process and in facility operations satisfy all applicable environmental, health and safety government regulations and directives. As a purchaser of products containing tin, tantalum, tungsten and gold (conflict minerals), we are committed to ensuring conflict free sourcing from our supply chain through collaboration with our suppliers.

## **4. Health and Safety Communication and Reporting**

Health and safety-related information is clearly posted in facilities and accessible by all workers. Training is provided to all workers and regularly thereafter. Workers are encouraged to raise any safety concerns to their manager, Human Resources or via the Veeco Hotline by calling 1-888-419-0572 and/or by visiting [veeco.alertline.com](http://veeco.alertline.com).

## **ETHICS**

Veeco and our suppliers uphold the highest standards of ethics.

### **1. Anti-corruption**

We abide by all anti-corruption laws everywhere we do business, without exception, and expect our suppliers to do the same. This includes the U.S. Foreign Corrupt Practices Act (FCPA), which applies to our businesses globally and other similar applicable laws in countries where we do business. Officers, directors, employees, business partners or any other third party acting on our behalf are prohibited from paying bribes or other prohibited payments to government officials and private individuals who interact with Veeco. We protect our employees against retaliation for refusing to do anything against the highest standards of integrity.

### **2. Privacy**

Veeco endeavors to protect the personal and confidential information of our employees, customers, suppliers and other appropriate persons. We have various policies concerning our collection, use, disclosure, and retention of personal information. Our policies are based on global standards reflective of our intent to maintain personal information securely and comply with applicable privacy and data protection requirements.

### **3. Protection of Identity and Non-Retaliation**

Veeco maintains programs to ensure the confidentiality, anonymity and protection of worker and supplier whistleblowers, unless prohibited by law. We communicate this process regularly and we reinforce that workers can raise any concern without the fear of retaliation.

## **MANAGEMENT SYSTEMS**

Veeco has several management systems that meet the RBA Code of Conduct standards. These systems ensure compliance with applicable laws, regulations and customer requirements related to Veeco's operations and products, conform to the RBA Code, and identify and mitigate risks.

### 1. Supplier Responsibility

We communicate the principles of the RBA Code of Conduct, our Code of Business Conduct and Human Rights Policy to our suppliers through our Quality Manual and supplier onboarding processes. We work closely with our suppliers to remediate any gaps identified through assessments or audits. As a purchaser of products containing tin, tantalum, tungsten and gold, we also expect our suppliers to engage in due diligence to analyze their sources as per the Responsible Minerals Initiative (RMI) protocol.

### 2. Assessments

Our operations are evaluated against human rights standards on a regular basis in accordance with Veeco's Code of Conduct and this Human Rights Policy. As a member of the RBA, we voluntarily adopted their Code of Conduct ensuring that Veeco and our supply chain are safe, workers are treated with respect and dignity and that business operations are environmentally responsible and conducted ethically. Each year, our manufacturing sites also complete a comprehensive internal audit based on the RBA Code of Conduct, and those results are released to all of our trading partners.

### 3. Training

All Veeco employees are required to complete training on and reaffirm their commitment to our Human Rights Policy during our annual Code of Business Conduct certification process. Select contractors also are trained on relevant human rights standards through our Code of Business Conduct, the RBA Code of Conduct and any relevant other training to ensure the human rights of the individual are maintained.

### 4. Grievance Mechanism

We strongly encourage our employees, third parties and other business partners to report any concerns or grievances related to our Company's operations. We use a third-party vendor Employee Concern Hotline which is available by phone and online 24 hours a day, seven days a week in all languages where we do business. Except as restricted by law, reports through the Employee Concern Hotline can also be made anonymously. We prohibit any form of retaliation against employees who make a report or raise a concern in good faith.

### 5. Due Diligence and Review

This Human Rights Policy shall be reviewed not less frequently than annually and will be updated as necessary. We engage all relevant groups including, but not limited to, corporate social responsibility, environmental, health and safety, human resources, legal, global security, and supply chain in our review and due diligence process. We also take into consideration input from third party stakeholders aware of material human rights issues and trends. The policy is reviewed and approved by our Executive Leadership Team any time a significant change is made. Every individual and department at our Company is responsible for understanding and implementing the rights covered in this policy.

#### Revision History

Revision	Description of Revision and Reason	Effective Date
A	Initial release of Veeco's Human Rights Policy	6/01/2020