



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 is rooted in our Core Values and reinforced through our commitment to the Veeco and RBA Codes of Conduct and other Company policies. In addition, we are guided by the United Nations' Universal Declaration of Human Rights, and its values are reflected in this Human Rights Policy and our Code of Conduct. Furthermore, we support and respect human rights as outlined in the United Nations Guiding Principles on Business and Human Rights. This Human Rights Policy applies to all Veeco employees, major suppliers, select service providers, and contractors, and it conforms with the RBA.

## **LABOR**

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

### **1. Diversity and Non-Discrimination**

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, religion, sex, age, national origin, disability, veteran status, genetic information, and other legally protected characteristics. We believe that workplace 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 religious practices and 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, religion, sex, age, national origin, disability, veteran status, genetic information, and other legally protected characteristics.

### **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 is strictly forbidden. This principle applies with equal force to our suppliers and members of our supply chain, and we will not accept products or services from third-party providers who we believe may be engaged in acts of slavery or human trafficking (please see our Supplier Code of Conduct for additional details). 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. There are no restrictions on workers' freedom of movement while in the workplace. 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 about human trafficking through our Veeco Hotline at 1-888-419-0572 or [veeco.alertline.com](https://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.

#### **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 location 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. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

#### **6. Humane Treatment Fundamental Rights**

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. Furthermore, we respect and promote the fundamental rights of human beings, including, without limitation, the fundamental right to access clean and sanitary fresh water.

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

Following 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 that is not disruptive to the work environment, 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 Veeco executive leadership team member. Veeco managers will not interfere with any collective bargaining activities. Veeco will not influence, financially or otherwise, the activities of any employee organization.

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

Veeco workers enter, review, and submit for approval their work hours 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.

### **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. Our goal at Veeco is zero recordable injuries (as defined by the U.S. Occupational Safety and Health Administration).

### **2. Environmental Stewardship**

We work to promote a greener world through our operations by consuming less energy and water, decreasing waste, and reducing emissions. Please see our Corporate Sustainability Reports, our Environmental & Social Responsibility Statement, and our EH&S Policy Statement for additional details.

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

## **ETHICS**

Veeco and our suppliers uphold the highest standards of ethics.

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

Without exception, we abide by all anti-corruption laws everywhere we do business 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 reinforce that workers can raise any concern without fearing 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. The Chief Administrative Officer (CAO) is authorized and responsible for implementing these management systems.

### **1. Supplier Responsibility**

We communicate the principles of the RBA Code of Conduct, our Code of Conduct, and our Human Rights Policy to our suppliers through our Supplier Code of Conduct and Supplier Quality Manual. As appropriate, we will work closely with our suppliers to remediate any gaps or instances of noncompliance. 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 regularly evaluated against human rights standards per 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 business operations are environmentally responsible and conducted ethically. Veeco regularly assesses its own and its suppliers' conformance to the Veeco Code of Conduct. These assessments may be conducted by Veeco resources or by an approved third party.

### **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 Conduct certification process. In addition, key suppliers are required by contract to abide by our codes and policies, further helping 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 to operate our 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 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 periodically reviewed 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. Our Executive Leadership Team reviews and approves the policy any time a significant change is made. Every individual 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	5/26/2020
B	Revisions to reflect Veeco's working hour and other practices	9/13/2022
C	Revisions to clarify respect for fundamental rights and other practices	2/24/2023
D	Revisions to clarify consistency with international standards	11/27/2023
E	Revisions to comply with Executive Order 14173	6/4/2025