



SOCIAL RESPONSIBILITY STATEMENT

Veeco Instruments Inc. (“Veeco” or “we”) has implemented social responsibility programs that apply across our organization and to our suppliers. These programs are based on our core values and are integrated into our corporate culture. Veeco policies are modeled on the Responsible Business Alliance Code of Conduct. We are committed to upholding the highest levels of integrity and are working to improve social, ethical, safety and environmental conditions across our organization.

OUR PEOPLE

We have established employment policies based on our belief that a diverse and motivated workforce is vital to our success. We are committed to providing our workers with fair treatment, equal opportunity and an environment free from unlawful discrimination.

We expect our workers and suppliers to comply with the following principles:

- 1) **Freely Chosen Employment**—Forced, bonded or indentured labor, or involuntary or exploitive prison labor, slavery or trafficking of persons shall not be used. Workers shall not be required to surrender government issued identification, passports or work permits as a condition of employment. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility, nor unreasonable restrictions on entering or exiting company-provided facilities. Employers and their agents may not hold or otherwise destroy, conceal, confiscate or deny workers access to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employer’s or agent’s recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.
- 2) **Young Workers**—Child labor is not to be used anywhere. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with applicable laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and/or extensive overtime. The employer shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. The employer shall provide appropriate support and training to all student workers.
- 3) **Working Hours**—Studies of business practices link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the

maximum set by local law and workers should not routinely work more than 60 hours in a week, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

- 4) **Wages and Benefits**—Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.
- 5) **Humane Treatment**—There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary action, up to and including termination, may result from a breach of these requirements.
- 6) **Non-Discrimination**—We are committed to a workforce free of harassment and unlawful discrimination. There is to be no 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 or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or candidates for employment will not be subjected to medical tests or physical exams that could be used in an unlawful, discriminatory way.
- 7) **Freedom of Association**—We shall respect the rights of workers to associate freely, to form and join trade unions and/or workers' councils, to bargain collectively and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities, in all cases, in conformance with local law. Workers and/or their representatives shall be able to communicate openly and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, retaliation, intimidation or harassment.

HEALTH AND SAFETY

In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of our products and services, consistency of production and worker retention and morale. Ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

We support the following health and safety standards and expect our suppliers to do the same:

- 1) **Occupational Safety**—Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) is to be assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety

- training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about the risks associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.
- 2) **Emergency Preparedness**—Potential emergency situations and events are to be assessed and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, gas detection equipment (where appropriate), clear and unobstructed egress, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.
 - 3) **Occupational Injury and Illness**—Procedures are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide or arrange for necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.
 - 4) **Industrial Hygiene**—Worker exposure to chemical, biological and physical agents is to be evaluated and controlled, according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards. Upon request, workers will be provided with applicable material safety data sheets.
 - 5) **Physically Demanding Work**—Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be evaluated and controlled.
 - 6) **Machine Safeguarding**—Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
 - 7) **Sanitation, Food, Work Space** —Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary eating facilities. In addition, work spaces shall be equipped with adequate lighting and environmental controls (heating, ventilation and, where appropriate, air conditioning).
 - 8) **Health and Safety Communication**—Workers shall be provided with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand. Health and safety related information shall be clearly posted in

locations accessible by all workers. Workers shall be encouraged to raise health and safety concerns and shall not be disciplined for raising these concerns.

ENVIRONMENTAL

Environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

We support the following environmental standards and expect our suppliers to do the same:

- 1) **Environmental Permits and Reporting**—All required environmental permits, approvals and registrations are to be obtained and kept current and their operational and reporting requirements are to be followed.
- 2) **Pollution Prevention and Resource Reduction**—Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or minimized by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.
- 3) **Hazardous Substances**— Chemicals and other materials posing a hazard to humans or the environment are to be labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- 4) **Solid Waste**— Solid, non-hazardous waste shall be managed, reduced by practical means and responsibly disposed of.
- 5) **Air Emissions**—Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be monitored, controlled and treated as required prior to discharge. Periodic testing shall be conducted of the performance of air emission control systems to ensure proper performance and regulatory compliance.
- 6) **Materials Restrictions**—We are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- 7) **Water Management**—Water sources, use and discharge shall be monitored and we shall seek opportunities to conserve water by practical means.
- 8) **Energy Consumption and Greenhouse Gas Emissions**— Energy consumption is to be monitored, at the facility and/or corporate level. Cost-effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions should be explored and pursued, if practical.

ETHICS

To meet social responsibilities and to achieve success in the marketplace, we and our agents are to uphold the highest standards of ethics including:

- 1) **Business Integrity**—The highest standards of integrity are to be upheld in all business interactions. We have a zero-tolerance policy that prohibits all forms of bribery, corruption, extortion and embezzlement.
- 2) **No Improper Advantage**—Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Worker training and reporting procedures shall be implemented to ensure compliance with anti-corruption laws.
- 3) **Disclosure of Information**—All business dealings should be transparently performed and accurately reflected on our business books and records. Information regarding our labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 4) **Intellectual Property**—Intellectual property rights are to be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Customer and supplier information is to be safeguarded.
- 5) **Fair Business, Advertising and Competition**—Standards of fair business, advertising and competition are to be upheld.
- 6) **Protection of Identity and Non-Retaliation**—The confidentiality, anonymity and protection of supplier and worker whistleblowers¹ are to be maintained, unless prohibited by law. A process for our personnel to be able to raise any concerns without fear of retaliation has been implemented and communicated. The Veeco Global Hotline provides a means by which workers can report concerns confidentially and, if desired, anonymously.
- 7) **Responsible Sourcing of Minerals**—We have adopted a conflict minerals policy to reasonably assure that the tantalum, tin, tungsten and gold in the products we manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. We exercise due diligence on the source and chain of custody of these minerals and make our due diligence measures available to customers upon request.
- 8) **Privacy**—We are committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers and

¹ Whistleblower definition: Any person who makes a disclosure about improper conduct by a worker or officer of a company.

employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

MANAGEMENT COMMITMENT

We are committed to promoting: (a) compliance with applicable laws, regulations and customer requirements related to our operations and products; (b) conformance with this Social Responsibility Statement; (c) mitigation of operational risks related to this Social Responsibility Statement; and (d) continual improvement.

Our commitment includes the following elements:

- 1) Company Commitment**—Our commitment to social and environmental compliance and continual improvement, endorsed by executive management.
- 2) Management Accountability and Responsibility**—Identification of senior executive and company representatives responsible for ensuring implementation of this Social Responsibility Statement and associated programs. Senior management periodically reviews the status of the implementation and compliance.
- 3) Legal and Customer Requirements**—Understanding and monitoring applicable laws, regulations and customer requirements, including the requirements of this Social Responsibility Statement.
- 4) Risk Assessment and Risk Management**—Identifying the legal compliance, environmental, health and safety, labor practice, and ethics risks associated with our operations. Determination of the relative significance for each risk and implementation of appropriate steps to mitigate such risks and ensure regulatory compliance.
- 5) Improvement Objectives**—Performance objectives and plans to improve our social and environmental performance, including a periodic assessment of our performance in achieving those objectives.
- 6) Training**—Programs for training managers and workers to implement our policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- 7) Communication**—Communicating clear and accurate information about our policies, practices, expectations and performance to workers, in the language of the worker or in a language the worker can understand, as well as to suppliers and customers.
- 8) Worker Feedback, Participation and Grievance**—Effective feedback and grievance mechanisms to assess workers' understanding of and obtain feedback on practices covered by this Social Responsibility Statement and to foster continuous improvement.
- 9) Audits and Assessments**—Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Social Responsibility Statement and customer contractual requirements related to social and environmental responsibility.

- 10) Corrective Action Process**—Timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- 11) Documentation and Records**—Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- 12) Supplier Responsibility**—Communicate requirements of this Social Responsibility Statement to suppliers and monitor key supplier compliance.

OUR COMMUNITIES

We recognize our obligation to be a responsible community member. We encourage all workers to participate in activities aimed at bettering the communities in which we live and work.

OUR SUPPLIERS

We shall communicate this Social Responsibility Statement to our key suppliers and expect them to comply with this Social Responsibility Statement. Suppliers working with us are responsible for knowing and understanding our policies and ensuring that those policies are reflected in their daily business activities. Suppliers have a responsibility to report to us any instance of non-compliance they may observe. We reserve the right to audit supplier records and facilities to ensure our suppliers are in compliance.

Our social responsibility efforts and our supply chain sustainability goals are constantly evolving. We are committed to working collaboratively with our suppliers to ensure continuous improvement toward these goals.

We encourage our supply chain partners to establish a sustainable management system to comply with our commitment to social responsibility that contains the elements of this Social Responsibility Statement.

REPORTING AND ENFORCEMENT

We require our workers to immediately report any violations of our company policies or this Social Responsibility Statement. Reports may be made to any supervisor, the Human Resources Department, any Veeco corporate officer, the General Counsel, or the Veeco Global Hotline, where reports may be made confidentially and, if desired, anonymously. Compliance with this Social Responsibility Statement and with the various Veeco policies is a condition of employment. Retaliation for reporting an incident is strictly prohibited. Non-compliance should be reported at veeco.alertline.com.

Veeco is committed to continuous improvement in all areas of social responsibility and regularly reviews, improves and updates relevant company policies.

This Social Responsibility Statement was adopted on March 20, 2019.