The ASML

Code of Conduct & Business Principles

Public
Dear colleagues and other stakeholders,

The ASML Code of Conduct (‘Code’) describes what ASML stands for and believes in. It touches on cultural norms and values and is meant to be a common-sense approach to global standards and regulations. We urge you to integrate it into your personal working style and make it a key approach to your daily activities. The Code is not an all-encompassing document, but guides us in making sound and ethical decisions.

We are committed to providing an open culture and offering you as much help as possible. To enable you to understand and follow the Code, we provide you with a dedicated ethics program and Ethics Office, which offers you support, advice, training and communication. If you have any questions or doubts on what compliance to the Code means in particular circumstances, reach out to your local Ethics Liaison or the ASML Corporate Ethics Office who will always support you to do the right thing. We also urge you to raise genuine concerns. ASML will never censure you for raising an issue and urges you not to remain silent.

Please take the time to familiarize yourself with the content of the Code of Conduct, the Business Principles and our underlying Corporate Policies and abide by them at all times.

Sincerely,

Peter Wennink | President and CEO

Martin van den Brink | President and CTO
**Introduction**

This Booklet contains the ASML Code of Conduct (‘Code’) and corresponding Business Principles. You will find a copy of our Code, which states our five core values, in the first chapter of this booklet. Consequently, each chapter then provides additional context and further guidance to each core value (‘Business Principles’) as stated in our Code.

The Code and Business Principles are not intended to fully cover all of our values and principles. In some cases it may be necessary to read more detailed material to fully understand what is required. The Business Principles are supported by our Corporate Policies, some of which are highlighted in this booklet. Employees can find a complete overview of all relevant Corporate Policies on the internal policy portal on the ASML intranet.

If you have any questions, suggestions or remarks please contact the Corporate Ethics Office (contact details are provided at the end of this booklet).
ASML Code of Conduct & Business Principles Essentials

Who has issued the Code and the Business Principles?
The ASML Board of Management is responsible for approving and issuing the Code and Business Principles which are effective as of October 2016 and replace our Code of Conduct of September 2011 and the Business Principles issued December 2012.

Why additional Business Principles?
ASML wants to provide greater clarity about the standards we expect our employees to follow and the behavior they must adopt. The Business Principles serve this purpose as these apply equally to all ASML employees worldwide and contain essential rules which must be followed each day. The Business Principles help us to drive ethical and balanced behavior, control our business exposure and safeguard the company’s reputation. In addition to the Business Principles ASML offers you via its Ethics Program, support, advice, training, additional guidance via policies, procedures, “Cases & Dilemmas”. Please contact your local Ethics Liaison or the Corporate Ethics Office for more information on our Ethics Program.

How are the Code and the Business Principles reviewed or amended?
The Code and Business Principles are periodically reviewed and approved by the Ethics Board as revisions may be required due to changes in law or regulations, or changes in our business or the business environment.

To whom do the Code and Business Principles apply?
All employees (fixed and flex) of ASML world-wide are obligated to live up to the expectations that we set ourselves in the Code and Business Principles. Additional emphasis is placed upon managers of all levels who are entrusted to ensure that their direct reports receive appropriate ethical guidance and support. The Code and the Business Principles are in line with the Electronic Industry Citizenship Coalition’s (‘EICC’) Code of Conduct. We actively pursue adherence to the EICC Code of Conduct by our suppliers.

Is any acknowledgment or certification required?
All employees, including our managers, officers and executive management, are required to acknowledge that they have read and understood our Code and corresponding Business Principles. Employees also commit to comply with our Code in their (employment) contract, and are expected to report any potential conflict of interest or any other possible exception to or violation of the Code.

What happens in case of a violation of the Code of Conduct?
Any breach of the Code is taken seriously as ASML or individual employees could potentially be exposed to fines, penalties and criminal liability. Depending on the circumstances of a particular breach, the response from ASML could include (where permitted by law) and in line with our internal global corrective actions (sanctions) policy and local procedures: re-training, demotion, dismissal, evaluation or other employment consequences, including disciplinary actions up to and including termination of employment.
This applies equally to violations as a result of:
- Failing to complete a required Code of Conduct training or certification process.
- Requesting or permitting others to violate the Code.
- Failing to promptly report a known or suspected violation of the Code.
- Failing to cooperate with investigations or audits related to suspected Code violation.
- Retaliating against another employee or third party for reporting a suspected violation of the Code.

What if I suspect/ witness a violation of the Code?
Any (possible) violation of the Code should always be reported in line with the ASML Speak Up Policy.

The Code of Conduct states our five core values

- We respect people and planet
- We operate with integrity
- We preserve our assets
- We manage professionally
- We encourage to Speak Up

Approved by the Ethics Board: September 2016. Effective date: October 2016.

This Code of Conduct (‘Code’) describes what ASML stands for and believes in. The Code guides us in making sound and ethical decisions that are in the best interest of all ASML stakeholders.

The Code describes five core values and corresponding Business Principles which are further explained and detailed in the ‘ASML Code of Conduct and Business Principles Guide’.

This Code and the Business Principles apply to all ASML employees worldwide and are in line with the Electronic Industry Citizenship Coalition’s (‘EICC’) Code of Conduct. We actively pursue adherence to the EICC Code of Conduct by our suppliers.

We respect people and planet
- We define and execute our business strategy with a responsibility for the economic, social and environmental impact of our activities and products.
- We respect our employees, value their different cultural identities and fully acknowledge their individual contributions.
- We are committed to a safe and healthy working environment where mutual respect prevails.
- We provide working conditions based on objective and non-discrimination criteria, which include a commitment to diversity and equal opportunities for all employees.
- We respect the rights of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly.
- We show zero tolerance to any form of discrimination or harassment.
- We do not use forced, bonded or indentured labor, involuntary prison labor, slavery, child labor or trafficking of persons.
- We care for and contribute to the communities in which we operate.
- We continuously improve our own environmental performance by reducing harmful emissions to air, soil and water.
- We aim to improve the resource efficiency of our products and to enable significant improvements in energy efficiency of computing systems.

We operate with integrity
- We adhere to applicable laws, regulations and corporate governance standards.
- We operate our business on the basis of integrity, excellence, commitment and bay play. We expect the same from those parties with whom we do business.
- We avoid (possible) conflicts of interests between personal and professional relationships. This also means that we do not use company opportunities for personal gain.
- We do not tolerate any form of bribery and/or corruption.
- We continuously promote honest and accountable behavior.

We preserve our assets
- We carefully preserve and protect our intellectual property and deal with information to secure the required level of confidentiality, integrity and availability of that information.
- We use and protect company assets responsibly and professionally for ASML’s legitimate business purposes.
- We respect and safeguard third party assets and information.
- We respect each individual’s right to privacy and therefore protect and deal respectfully with any personal data we process.

We manage professionally
- We manage exposure by following processes and policies.
- We apply high quality in accounting, reviewing, reporting, auditing and disclosing.

We encourage to Speak Up
- We value and encourage individuals to speak up and raise concerns about actual or suspected misconduct.
- We deal with concerns in a professional, confidential and respectful manner. Individuals speaking up in good faith are protected from any form of retaliation.
- Our Speak Up Policy is available to employees, customers, suppliers and published on www.asml.com in multiple languages.

Support
Please feel free to contact your local Ethics Liaison or the Corporate Ethics Office ethicsoffice@asml.com at all times for assistance or concerns.
Business Principles

We respect people and planet

ASML is committed to a working environment where mutual respect prevails and we all take responsibility for agreed commitments, to achieve value creation for customers, employees, shareholders, suppliers and society at large.

ASML is committed to conducting business in a manner which enables sustainable growth whilst fulfilling legal and moral obligations. We aim to achieve our business objectives in a caring and responsible manner, taking responsibility for the economic, social and environmental impacts of our activities and products.

ASML is committed to the United Nations ("UN") guiding principles on Business and Human Rights as well as the International Labor Organisation ("ILO") Declaration on Fundamental Principles and Rights at Work, the UN declaration of human rights, the UN global compact and the principles as laid down in the Organisation for Economic Co-operation and Development ("OECD") guidelines for Multinational Enterprises.
We respect people and planet

**Value and respect differences** of opinion, experiences, characteristics, backgrounds and cultural identities. Diversity of cultures, education and talents help make us a stronger, more creative and innovative company. By working together we jointly create a motivating working environment which enables successes and leads to better results than any of us can achieve alone.

**Endeavor to contribute to the communities in which we operate,** particularly those neighboring our sites. We believe in collaborative, consultative, and partnership approaches in our community investment programs. ASML also sponsors various charity projects via the independent ASML Foundation.

**We pay fair and balanced compensation and benefits** consistent with the provisions of all applicable wage laws, including those relating to minimum wage, overtime hours, and legally mandated benefits. Employees are informed of pay and benefits in a detailed and clear manner prior to and during employment.

**Provide equal opportunity** for all in recruiting, hiring, training, promoting and compensating. Recognize the freedom of employees to establish or join a workers organization or trade union of their choice.

**Promote employability and vitality** of our employees by:
- Providing a healthy, safe and inspiring workplace where employees work, meet, share and learn.
- Stimulating personal, professional and career development and contributing to their talent development.
- Supporting employees in achieving a work-life balance and do not allow workweeks to exceed the maximum as set by local law.

**Continuously look for ways to improve** the environmental performance of our own operations and products by promoting circular economy and refurbishing and re-using as many parts from our systems as possible.

**Do not engage disrespectfully** with others. Mutual respect is crucial for optimally working together and therefore to our success.

**We do not tolerate any form of discrimination or harassment.** All ASML employees should be treated fairly and equally without discrimination as to race, gender, religion, sexual preference, political opinion, national or social origin, property, age or other status. The right to equality without discrimination does not make all differences of treatment discriminatory. Differentiation is possible if based on reasonable and objective criteria.

**Under no circumstances make use of forced labor.** We will only employ, directly or through others, people who are working of their own free will. Lodging of deposits is never required and no one shall be deprived of his or her identity papers upon starting work for ASML. Depending on local law, employees are free to terminate their employment with ASML upon reasonable notice.

**We do not allow deductions from wages as a disciplinary measure unless serious grounds require otherwise.** In addition, any disciplinary measure has to be in accordance with applicable law.
Your colleague constantly sneers at you. She doesn’t seem to approve of anything you do. After a while, and several attempts to explain that you do not appreciate her behavior, you don’t feel comfortable anymore. Other colleagues do not seem to understand your concern. What should you do?

Discuss this with your direct manager, HR contact or your local Ethics Liaison (see Speak-Up flow on page 40) and explain what is happening. They will treat your concern with confidentiality. Remember that ASML does not tolerate any form of harassment.

ASML employees can refer to the Ethics intranet site for more “Cases & Dilemmas”.

Treat people the way you want to be treated.
Talk to people the way you want to be talked to.
Respect is given, not earned.

– Golden Rule
Business Principles

We operate with integrity

We believe that a strong culture for integrity and compliance underpins our business success. We define ‘integrity’ as acting with honesty, sincerity, care and reliability. Compliance not only means complying with laws and regulations but also with high ethical standards.

A reputation for integrity is a priceless asset and reflected by our daily behavior. It is therefore essential to demonstrate personal and business integrity by not improperly influencing others or letting them improperly influence us; not manipulating information, documentation or records; adhering to relevant sectors’ commitments; showing zero tolerance for lack of integrity, fraud, bribery or corruption; leading by example and driving personal and group adherence to our Code of Conduct.

When conducting business, employees may encounter a variety of legal issues or may question legality of an action. When this happens, employees should check with their manager and/or the legal department before acting.
Always avoid conflicts of interests. Your business decisions must not be influenced by personal and private considerations. A conflict of interest can influence your decision making or be perceived to do so and put at risk your reputation and that of ASML.

Follow and familiarize yourself with rules and policy regarding insider trading rules, in particular:
- Do not trade directly or indirectly in any shares and/or options of ASML while possessing Inside Information;
- Never share ASML stock-price sensitive (Inside) Information with others outside ASML (and within ASML only in case of need to know) and do not advise others about trading in ASML securities if you have Inside Information.

Make sure that the people you work with understand that bribery and corruption is not acceptable.

Abide by competition laws (antitrust), in particular:
- Compete vigorously but always in full compliance with local competition laws and with the ASML Antitrust Compliance Policy (in particular when negotiating supplier, sales and/or joint development agreements);
- Consult the Corporate Legal Department before any of the following is considered or encountered: any refusal to deal, differentiating pricing or terms for similar products and business conditions, tying the sale of one product to another, high pricing and/or low pricing versus average;
- Do not entertain any discussions with competitors, without first contacting Corporate Legal, and preparing a proper environment to avoid any collusion or risk of collusion;
- When referring to our market position, market share statistics, estimates and the like only use statements officially released by Corporate Communications.

Comply with our Trade Compliance Policy which covers goods, services and exchanging information across national boundaries in particular, international trade restrictions (embargo), export goods, services, ‘controlled’ software and/or technology only if you have obtained an approved export license (this also applies to cross border access to databases with such software and/or technology).

Letting outside interests or personal relationships unduly influence your business decisions is not ok. You must avoid conflicts of interest. A conflict of interest can influence your decision making, or be perceived to do so and put your reputation at risk and that of ASML. Furthermore, maintaining or acquiring interests in other businesses and perform external professional activities in your own time is not permissible if there is an actual or potential conflict of interest.

Allowing the giving or receipt of gifts and entertainment to influence your business decisions or cause others to perceive an influence is not acceptable and could result in facing legal or disciplinary action or dismissal. Make sure you are familiar with and follow the ASML Gifts & Entertainment Policy and the ASML Anti-Bribery & Corruption Policy. When in doubt discuss this with your manager or contact your local Ethics Liaison/ Corporate Ethics Office.

Do not use your professional influence to obtain personal advantages for you or your relatives.

Charging personal, non-business related expenses to ASML is never ok. Only charge those expenses that are in accordance with our internal policies (such as our global travel policy).

Do not use Inside Information to conduct or try to conduct a transaction or spread rumours to attract business or improve your performance. You should be aware of what it means to be an insider, if you have been classified as such a ‘designated’ person. If you have been classified as an insider you are bound by specific rules.

We do not want to do business with or support companies that do not address conflict minerals issues in their supply chain.
Challenge Yourself

One of our suppliers invites you to a business dinner together with your partner. Can you accept this invitation?

As a rule, family members should not accompany you to business events, but there might be exceptions. In any case, you should discuss this with your direct manager and seek the necessary approvals before you accept the invitation.

ASML employees can refer to the Ethics intranet site for more “Cases & Dilemmas”.

Integrity is not a 90 percent thing, not a 95 percent thing; Either you have it or you don’t.

– Peter Scotese
American textile executive

Relevant ASML Corporate Policies
Insider Trading Policy
Antitrust Compliancy Policy
Gifts & Entertainment Policy
Anti-Bribery and Corruption Policy
Trade Compliance Policy
Global Business Travel & Expense Policy
Business Principles

We preserve our assets

ASML highly values and protects all its assets and our existence is based on people and knowledge. ASML therefore expects anyone entrusted with ASML assets to keep them safe from loss, damage, misuse, or theft. Under ‘assets’ we do not only mean physical assets, such as products, tooling, funds, computers for conducting ASML business but also information (Intellectual Property (‘IP’), product-, business- and personal data). ASML assets shall never be used for purposes that violate the law or company policies.

Unauthorized disclosure of information of ASML, its customers or suppliers may benefit competitors, negatively affect ASML’s ability to file patents or affect cooperation with customer and suppliers. Therefore it is critical to guarantee the confidentiality of information. At the same time ASML’s operations are highly dependent on reliable information processing. It is critical to guarantee the integrity and availability of information. It is important to report in a timely way any (possible) information leakage from ASML by following our information leakage procedures.

ASML respects the privacy rights of our employees, customers, suppliers and business partners. ASML is committed to managing personal data in a professional, lawful and ethical way in line with our Privacy Codes and in compliance with applicable laws and regulations.
You should not share Company-Secret and Confidential information unless approved explicitly in line with our Knowledge Protection Policy; this covers, amongst others, details on how our products work such as Technical Process Documentation, design principles summary and detailed photos of critical designs. Communicating specific techniques towards suppliers and technology partners is only allowed when protected by a signed Non-Disclosure Agreement.

Never leave Confidential information unattended nor discuss Confidential information in public without the necessary internal approvals (e.g. Corporate Communications or Investor Relations). Embed knowledge protection in your daily behavior, such as, locking your computer when getting a coffee and avoid discussing confidential information in the elevator.

Using ASML assets without the appropriate authorizations by management could create a serious risk for ASML and must be avoided at all times.

Do not claim or take ownership of ASML specific assets (12 nc’s) and non-ASML specific assets (tools, measuring equipment, furniture etc.) even when these are identified as scrap materials. Scrap materials are always scrapped by a designated trusted third party or sold to a legitimate third party that ASML decides to use for this purpose. They are never to be sold or granted to employees.
Challenge Yourself

You receive a phone call from a journalist regarding an important joint development project that you are working on with one of ASML’s suppliers. What should you do?

According to our Knowledge Protection Policy, you should not discuss this subject with the journalist but refer him/her to our Corporate Communications department.

ASML employees can refer to the Ethics intranet site for more “Cases & Dilemmas”.

Values are like fingerprints. Nobody’s are the same, but you leave them all over everything you do.

– Elvis Presley
Business Principles

We manage professionally

ASML wants to manage its exposure by demonstrating discipline in following defined processes and policies as this helps to avoid unnecessary risks, increases efficiency and value creation, while demonstrating professionalism.

Quality is essential for our technology leadership, reinforced by a company-wide quality culture to ensure the high performance of our products, continuous process improvement, and dedication of suppliers and our people. Quality is an integral part of all activities performed within the Company. By delivering quality, we manage professionally.

ASML insists on checks and balances and careful management when committing our company. ASML wants to avoid being confronted with all kinds of obligations which were not authorized at the correct management level. Therefore we have devised a worldwide system of authorizations so each employee knows exactly if and to what extent he/she can commit our company. If you have not been granted any authorization in writing, you will need higher management approval before entering into binding commitments.
Commit yourself to the quality values for delivering quality products and services that consistently meet or exceed those expectations as agreed with our customers. Apply your expertise and experience to aid ASML in continuously improving its products, services, and processes. The quality values are part of the ASML culture.

Make sure that safety comes first at all times. By staying alert you can do a lot yourself with respect to safety of our products, tools, processes and work places. We have various channels available at ASML to look into genuine safety concerns that you cannot address yourself.

Ensure commitments are in line with agreed (financial) plans. Whenever you wish to commit the company to binding arrangements, make sure to follow the Review and Sign-Off Policy and the correct internal authorization procedures in a timely manner. This helps ASML to keep control of its commitments to third parties and avoid unnecessary risks. It is required that contracts are signed by persons with the proper formal signing authority.

Documents, agreements, and underlying evidence related to commitments made by ASML must be but properly secured, and retained to ensure access to such documents for all authorized parties.

Ensure that ASML financial and non-financial statements are full, fair, accurate, timely, and understandable. In order to do so, we must comply with legal and regulatory requirements and employees shall be familiar with ASML’s internal controls and policies. We shall never make false or misleading claims or statements in any of ASML’s financial reports, monitoring reports, or other documents submitted to government agencies and investors, or in any publication, including advertisements.

You should not commit ASML to any obligation or agreement unless you have followed the correct internal (authorization) procedures and subsequently received the proper authorization to do so.

Do not make third party commitments without proper written contracts or purchase orders duly authorized, before commitment is made; payments can only be executed with proper authorization, an authorized purchase order, and underlying evidence of delivered goods or services. 

Using inappropriate business language in any communication is not ok. Avoid unsolicited written opinions or judgments that cannot be substantiated or which are not clearly given as tentative or subject to further scrutiny.

Do not destroy or delete (digital) documentation and records, without the proper authorization. Keep accurate and transparent records, make them available to appropriate reporting channels, including auditors, prompted and unprompted, and promptly report all important exposures (i.e. risks and opportunities).
Challenge Yourself

You notice your manager negotiates the pricing and hiring of certain contractors but also approves their invoices. What do you do?

You are encouraged to indicate to your direct manager that a segregation of tasks and duties helps to avoid damage to his reputation as well as improves the efficiency at ASML. In case you feel uncomfortable speaking up, fear retaliation or notice that speaking up does not help sufficiently, please report the incident in accordance with the Speak Up Policy.

ASML employees can refer to the Ethics intranet site for more “Cases & Dilemmas”.

Relativity applies to physics, not ethics.

– Albert Einstein
We encourage to Speak Up

ASML is committed to conducting business based on our company values of fairness, integrity and respect for the applicable laws and regulations. In spite of this commitment, you may one day observe conduct that violates our Code of Conduct. Speaking Up is essential to sustain our reputation, success and ability to operate – both now and in the future. If you observe or suspect any misconduct, you should Speak Up. By doing so, you give ASML the opportunity to deal with the issue proactively.

Remaining silent about possible misconduct can worsen a situation and decrease trust. ASML truly values and encourages the help of employees who identify and Speak Up about potential misconduct. Those who Speak Up will be protected. Concerns raised will be treated confidential (and if necessary anonymous). You will not be retaliated against for raising concerns about suspected misconduct in good faith.

ASML has a Speak Up Policy in place (serves as the Whistleblowing Policy). The purpose of this Policy is to explain when, how and where you can raise concerns about suspected misconduct in confidence, respecting privacy and without fear of retaliation. It also describes what you may expect from ASML when you Speak Up and what possible steps will be taken after you raise a concern or file an ethics complaint.
We encourage you to Speak Up as soon as possible, ideally before a situation escalates. If you know about or suspect misconduct, Speak Up with the facts you have. We do not expect you to have all the answers and never start investigating any concern yourself. There are various options for support and advice available within our organization.

Our Speak Up Policy is applicable to everyone working for or on behalf of ASML worldwide. It is also available to any person or party with whom ASML has or has had a business relationship (such as business partners, suppliers, contractors, shareholders, agents, distributors, representatives and customers) and wish to raise a concern about possible misconduct within ASML.

ASML strongly encourages you to raise concerns internally through one of the available channels (see the Speak Up flowchart and the Speak Up Policy). By Speaking Up internally, you give ASML the chance to carefully look into the matter, take appropriate action if necessary and give you the support needed.

You may also choose to contact our Speak Up Service managed by our external and independent provider. The Speak Up Service acts as a confidential, secure and anonymous (if necessary and possible in your jurisdiction) communication channel between reporter of a concern and the ASML Corporate Ethics Office. Details on how to contact the Speak Up Service via telephone or web and how reports are being processed can be read in the Speak Up policy.

Reports on (suspected) breaches will always be investigated. ASML takes all reports seriously and will investigate accordingly. Where there has been a violation of the Code of Conduct, appropriate action will be taken.

The Speak Up Policy should not be used:
- for issues or grievances you may have in relation to HR matters (e.g. your terms of employment or performance related issues);
- for events presenting an immediate threat to life or property;
- with malicious intent (as this may lead to disciplinary measures imposed on you);
- to settle personal disputes;
- to make accusations which you know are false; and
- to obtain answers to questions or to provide comments on ASML policies/procedures interpretations or their applicability.

The following comments could be possible red flags and warning signs to STOP and seek advice when they relate to circumstances that are potential violations of our ethics (of course, depending specific context and circumstances):
“Nothing can go wrong”
“ASML owes me anyway”
“It’s the culture here”
“No one will notice”
“We’ve got to make our targets, so don’t worry about it now”
“It’s not my job – someone else will deal with it”
“We do not have the budget or the time to fix it”
“In our industry, that’s the way we do it”

Any form of threat or retaliation for rightfully speaking up will not be tolerated. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Directly contact the Corporate Ethics Office if you feel that your report may or has led to any negative personal consequences. This allows us to investigate this and take appropriate measures (if necessary).
Challenge Yourself

You witness a serious breach of the Code of Conduct by one of your colleagues and really want to report this. You know that you can contact your local Ethics Liaisons, but you are afraid the Ethics Liaison might pass this on to your manager and the person involved. You doubt whether to report the breach or not.

The local Ethics Liaison can always be contacted; the Ethics Liaison role is impartial, independent and ensures confidentiality. If you still do not feel comfortable contacting the local Ethics Liaison, please contact the Corporate Ethics Office. If you prefer to make an anonymous report, the Speak Up Service is available 24/7 by phone or internet.

ASML employees can refer to the Ethics intranet site for more “Cases & Dilemmas”.

The time is always right to do what is right.

– Martin Luther King
Annex I  Speak Up Flow Chart

I want to raise a concern. Where do I go?

- Do you feel comfortable speaking up yourself to the person(s) involved?
  - Yes: Discuss with the person(s) involved
  - No: Discuss with your direct manager or HR contact person, who will discuss with the person(s) involved

- Do you feel comfortable discussing the issue with your direct manager or your HR contact person?
  - Yes: Discuss with your direct manager or HR contact person, who will discuss with the person(s) involved
  - No: Use our Speak Up Service, managed by an independent, outside service company

- Do you want to remain anonymous?
  - Yes: Use our Speak Up Service, managed by an independent, outside service company
  - No: Contact Local Ethics Liaison or ASML Corporate Ethics Office

- Corporate Ethics Office decides if issue needs to be investigated by Ethics Complaints Committee or if another procedure applies

Do you have questions about the contents of the Code of Conduct, Business Principles, our Speak Up Policy or the Speak Up Service? Contact the Corporate Ethics Office or your local Ethics Liaison.
Annex II  Ethical Self Test

**Best self test**
Does this action represent my “best self”?  
Does it reflect the kind of person I want to be?

**Consequences test**
Will this action have negative consequences – hurt ASML, someone else or myself – that I will come to regret?

**Conscience test**
Does this action go against what my conscience tells me is right?  
If I do this, will I feel guilty or lose self-respect?

**Parent/family/colleagues test**
If I were to ask my parents, family colleagues or any other people I respect, would they approve of me doing this?

**Internet test**
Would I want this made public through facebook, youtube, twitter, texting etc and seen by my friends, family, colleagues or employer?

**Golden rule (reversibility) test**
Would I want someone to do this to me?

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**Administrative Information**

**Policy contact**  
ASML Corporate Ethics Office  
De Run 6501, 5504 DR Veldhoven  
Netherlands  
ethicsoffice@asml.com

**Effective date**  
2016

**Version**  
1.0

**Replaces**  

**Related documents**  

**Note**  
This document may not conflict with any local laws or regulations (and if such would be the case the law or regulation would prevail). Where the Business Principles captured in the Code of Conduct and/or this document are stricter than the applicable legislation or provide additional safeguards, rights or remedies, the Code of Conduct and Business Principles prevail.
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