

Speak Up Procedure

Established by the Management Board of ASM International N.V.

On December 16, 2023

Content

1. Message from the CEO	2
2. Simplified flow chart (local exceptions may apply)	3
3. General	4
4. No retaliation.....	5
5. Confidentiality.....	6
6. Scope of this Speak Up Procedure.....	7
7. Reporting channels and procedures.....	8
8. Privacy	10
9. External Reporting	11

1. Message from the CEO

As a leading supplier of semiconductor wafer processing equipment and process solutions, it is good to note that our innovation power comes directly from all of us, our people. Our ability to think creatively in collaborations, interactions, and innovative ideas to develop equipment and technology of the highest quality is what shapes us and keeps us ahead of what is next.

Our culture of trust, transparency and taking accountability gives our people the opportunity to develop their very best versions of themselves. At ASM, you are exposed to complex and demanding business situations to meet our ever-evolving customer needs and pushing all of you to take ownership. All of this is important for our success. At the same time, we need to bear in mind that the way in which we work and how we interact with our society is equally important. By conducting our business responsibly and role modelling our behaviors in society, we ensure that our success remains sustainable.

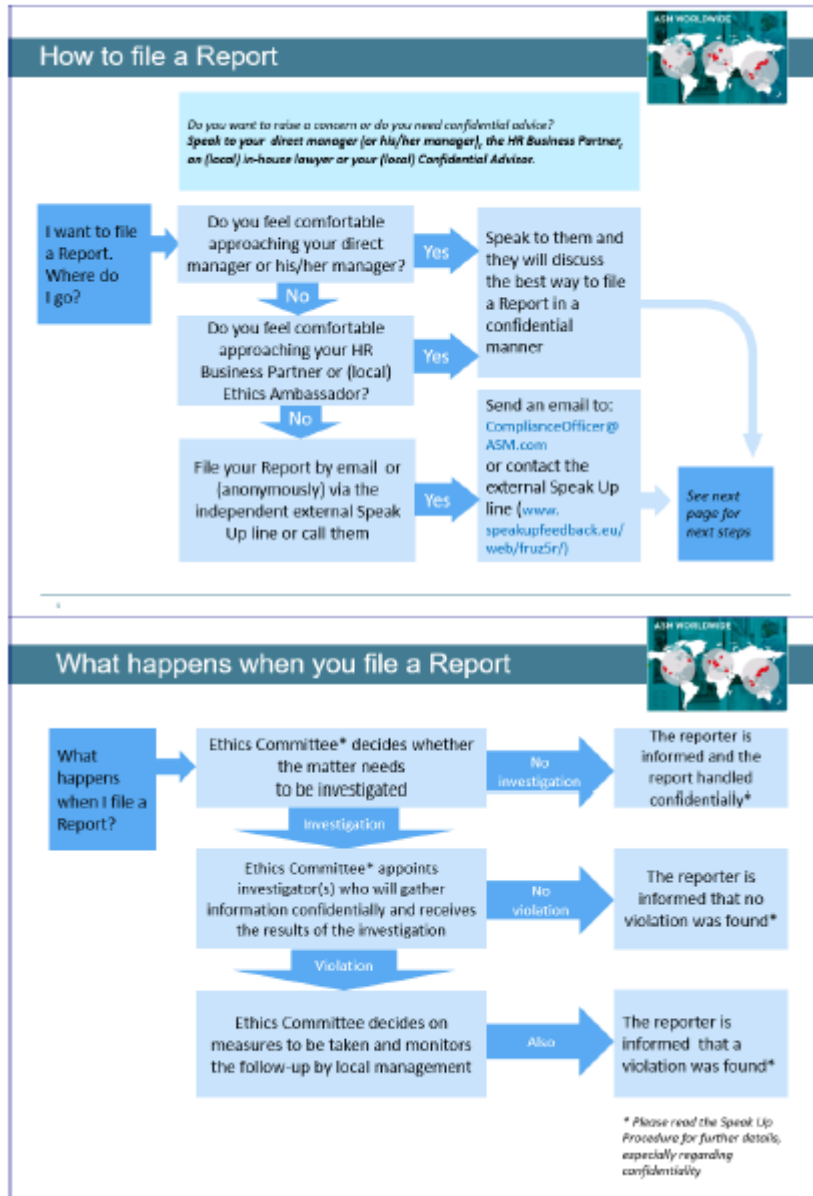
ASM's Code of Business Conduct reflects how we, as individuals, demonstrate ethical behavior in everyday interactions in accordance to the values of ASM and at the same time, how we as a company operate in all the countries we are present, as a socially responsible citizen. In today's increasingly complex world, I realize it may not always be as clear and easy how to act and react in each situation. The Code provides you with our rules and values and serves as a guide in your day-to-day behavior. As there will always be dilemmas, we should all assure that we can discuss these and come to the best solution.

We strongly encourage you to speak up in case you notice anything outside the ordinary course of business, something which you suspect violates our Code of Business Conduct. Such speaking up can help us improve our company, day after day. And rest assured: we protect all reporting in good faith, based on our non-retaliation approach.

We are committed to operating in a sustainable way. I believe that conducting our business in accordance with the ASM values and Code of Business Conduct and sharing concerns and reporting your suspicions in accordance with this Speak Up Procedure will ensure continued growth for the benefit of all our employees and other stakeholders, and the well-being of the communities in which we live and work.

Benjamin Loh CEO

2. Simplified flow chart (local exceptions may apply)



3. General

3.1 Why are you encouraged to speak up?

ASM encourages a culture of openness in which we all help to improve our daily operations. A culture in which we all feel comfortable raising questions and concerns related in any way to our Code of Business Conduct.

If you believe that a situation may be in violation of our Code of Business Conduct, the law, inconsistent with our values or if it simply does not feel right, please do not keep it to yourself. When you tell us about any concerns you may have, you enable us to take action and correct the situation. Before it is too late. The same applies in case you suspect that a violation is about to take place or is being covered up.

Although some of you may be nervous about raising such concerns, we encourage you to speak up as soon as something worries you. If you remain silent about a possible violation of our Code of Business Conduct, this can only make the situation worse.

3.2 Who may use this Speak Up Procedure?

This procedure applies to all employees as well as other stakeholders with a valid business interest in improving ASM's business (e.g. those working under the supervision of suppliers, seconded personnel and agency workers, contractors and sub-contractors, collaborators, freelancers and consultants, volunteers (paid or unpaid), trainees, apprentices and interns (paid or unpaid) and temporary workers). It also applies to shareholders, members of ASM's administrative, management, supervisory bodies (whether paid or unpaid). The procedure is also available to those whose working relationship with ASM has ended or those whose working relationship with ASM is yet to begin.

The aim should always be to improve ASM and to ensure we all work responsibly, based on ASM's values and Code of Business Conduct.

This Speak Up Procedure may not cover every set of circumstances and may require variation because of local law or situation. **Annex 4** contains an overview of such local variations. ASM's compliance or legal department should be consulted as necessary for advice.

4. No retaliation

4.1 How do we prevent negative effects on you?

ASM will not tolerate negative effects when you raise a concern and/or (subsequently) decide to file a formal report (“**Report**”) in good faith. The same applies to persons cooperating with investigations and to those who advise you in making a Report or investigating same. The concept of ‘good faith’ is explained in the next paragraph. If you feel you have been or are being punished or treated unfairly by anyone, please inform us via the same channels which you used to file your Report. In case of retaliation against you, the appropriate management level will be instructed by the Ethics Committee¹ to ensure that disciplinary measures are taken against the offender(s), in any case in compliance with applicable laws.

It may be that you wish to report a possible violation of our Code in which you personally participated. When dealing with a Report of this kind – and in deciding on possible disciplinary actions – ASM will take into account as a mitigating factor that you were the person who brought the matter to light.

4.2 Good faith or bad faith?

Those who raise a concern in good faith will not be put at a disadvantage as a result of speaking up. In this context good faith means that a person in similar circumstances would have reasonable grounds to believe or suspect that our Code of Business Conduct was violated, going to be violated, is being covered up or something illegal has occurred and that it is reasonable to raise a concern and/or file a Report in that case. If upon investigation no violation of our Code of Business Conduct or the law is discovered, no action will be taken against you – unless you raised your concern in bad faith.

Reporting in bad faith means you know or should know that what you are reporting is substantially not true, and (a) that you are abusing the reporting procedure because you have personal grievances, or (b) for your personal benefit. Filing a Report in bad faith will result in disciplinary consequences for you which could include dismissal, where in compliance with applicable laws.

¹ See Annex 3 for details on the Ethics Committee.

5. Confidentiality

5.1 How do we protect your identity?

You are under no obligation to identify yourself when making a report, and reports may be made on an anonymous basis. However, you are encouraged to submit your name with your report in order to allow the effective protection against any retaliation and better manage the reports if further information would be necessary. Indeed, in case of anonymous reports, you may be unable to qualify for whistleblower protections if there is no record of the report linking to you as an individual. Furthermore, concerns expressed anonymously are less powerful and tend to be more difficult to address effectively, but will nonetheless be considered and dealt with by ASM to the fullest extent possible.

In any case, the identity of the reporting individuals will be protected throughout the investigation (including in any disciplinary and criminal proceedings). In particular, all reports will be handled in a confidential manner. This means that where the Report includes your identity or you file a Report in person, your identity may only be shared if permitted by applicable law with limited authorized people on a strict need-to-know basis as necessary for conducting the Speak Up Procedure. At first the Report will only be reviewed by the Ethics Committee for the purpose of determining the next steps who will then decide whether anyone else needs to be involved in the investigation. Anyone involved during process are made aware of their confidentiality obligations.

Generally, persons involved in the investigation are not allowed to communicate your identity to others (except the investigators) without your permission². You will be asked for your permission before your identity is shared with anyone outside of the Speak Up Procedure (including any concerned persons).

You can also help us protect your identity by being discreet and limiting the circle of people with whom you share your concerns.

² The only exceptions are if ASM is under a legal or regulatory obligation to disclose the information and your identity; or you filed a Report in bad faith. Where possible you will be informed prior to your identity being communicated to anybody else.

6. Scope of this Speak Up Procedure

6.1 What kind of issues can be raised?

Employees and stakeholders are encouraged to raise a concern and/or file a Report if they know or suspect an issue is in violation of the law, or not entirely in line with ASM's values or with our Code of Business Conduct. This may include violations of any law or regulation including matters that are contrary to ASM's policies. A full list of policies is available [here](#).

This Speak Up Procedure is not intended to channel complaints about terms of employment, annual appraisals or similar HR-related matters.

6.2 What kind of issues must be raised?

Certain issues present risks to employees and to the future of our Company which are so high, that you cannot allow them to be ignored.

This is the case for circumstances which:

- Concern Health & Safety matters which are already reported in the Safety Incident Reporting (SIR) system, but are handled in a way that is unethical or inadequate for the circumstances; or
- seem to be in violation of a law for which a person could go to jail or for which ASM could end up paying a substantial fine (like fraud, theft, bribery and/or anti-competitive behavior), or suffer major reputation damage.

Where you suspect such circumstances, you must file a Report immediately.

6.3 What if you do not have all the facts?

Please raise your concern and/or file a Report, even if you do not have all the facts, as long as you have reasonable grounds to believe that the information in the report is true. Remember that the aim is to improve ASM and to ensure that we all follow our Code of Business Conduct. You may not start an investigation yourself.

6.4 What if you only need advice or support?

If you are uncertain whether a particular situation is an issue that should be raised or if you are looking for support in filing a Report, you are encouraged to first raise your concern on a confidential basis with your direct manager, or the other channels described in section 5. As indicated above, they cannot disclose your identity without your permission except as set out therein.

7. Reporting channels and procedures

7.1 Which channels can you use to file a Report?

We hope that you feel sufficiently comfortable in your work environment to raise your concerns and/or file a Report with your direct manager (or his/her manager). This method is encouraged because it is the fastest way to clear up any misunderstandings and to ensure an open, trusted working environment throughout the organization. Therefore, the preferred channel for raising your concerns or filing a Report is your direct manager (or his/her manager).

If you feel uncomfortable discussing a concern or filing a Report with your direct manager, if it is not possible to do so, or if you are dissatisfied with the outcome, you may choose to raise your concern or file your Report through the following local³ channels:

- the HR Business Partner;
- an Ethics Committee member or ambassador; or
- an in-house legal counsel,

the contact details of which can be found on the intranet of ASM.

If access is difficult or if you feel uncomfortable approaching any of the people above (for example because you fear retaliation) you can raise your concerns by sending an email to the ASM Global Compliance Officer (ComplianceOfficer@asm.com). You may also send the email anonymously, e.g. by an email address especially made for the purpose of the report.

Due to local legal restrictions, filing a Report via e-mail is not open to employees in Italy.

Our independent reporting line

If you do not feel comfortable using any of the above reporting channels you can also contact our independent external reporting line: the Speak Up line - available on a 24/7 basis. This system is operated by an independent third-party provider and the reporting data is stored outside our company. The system allows you to report your suspicions in anonymity (if allowed under local law), without the need to reveal your identity - unless you choose to do so. You can file your report by telephone to a local toll-free number or online (webservice) in your native language. See Annex 1 for details of this service.

7.2 Reporting by telephone or via an in person meeting

If you make a Report via a phone call or other type of voice message system, or you make a Report during an arranged in-person meeting we will either (i) record the conversation (where you have provided your consent to the recording); or (ii) or draft a complete and accurate account of the conversation. You will be provided with the opportunity to review and correct the transcript of the conversation to ensure the accuracy and will be asked to sign the transcript for approval.

7.3 What to put in a Report and what to expect?

When filing a Report please provide any information you have available and think could be relevant or may be useful (without conducting an investigation yourself; we leave that to appointed investigators).

³ Reports relating to a suspected violation of the Code by members of the Management Board and Executive Committee may also be filed directly with the Chair of the Supervisory Board of ASM International N.V. The same applies in case you suspect that a member of the Ethics Committee is involved in a violation. Send it to: chair.supervisoryboard@asm.com.

The information received will only be shared with others within or outside the company if and to the extent this is required to appropriately deal with the Report and the issues raised in it.

To file a Report, you can use the template provided in Annex 2 to this Speak Up Procedure, but feel free to file a Report in a format of your choice.

If your identity and contact details are known, receipt of your Report will be acknowledged within 7 days. If you use the external Speak Up line, a written Report made by the external supplier of the Speak Up line will be sent to the Ethics Committee.

ASM cannot guarantee the outcome expected or desired by you as reporter. However, ASM is committed to dealing with your genuine concerns in a fair and appropriate manner. If your identity and contact details are known, we will provide you with an update on the investigation within 3 months of our acknowledgement of receipt. More details about when ASM will contact you are described in Annex 3.

7.4 What happens after you file a Report?

Reported cases are handled by the Ethics Committee. The exact steps and what you can expect when the Ethics Committee handles your Report are described in Annex 3 hereto.

8. Privacy

8.1 How do we use your personal information?

At ASM, we are committed to protecting the privacy of everyone involved in the investigation in accordance with applicable laws. Any personal data obtained as part of any investigation set out in this procedure will only be used for the purposes described in this document. Such data will only be given to those persons who need to know.⁴

For ASM employees, seconded personnel and agency workers, contractors and sub-contractors, collaborators, freelancers and consultants, volunteers (paid or unpaid), trainees, apprentices and interns (paid or unpaid) and temporary workers): your personal data will be processed in accordance with GP 362 ASM Employment Privacy Policy.

For other stakeholders (e.g. suppliers, shareholders, members of ASM's administrative, management, supervisory bodies (whether paid or unpaid) and former employees: your personal data will be processed in accordance with the ASM Data Privacy Policy (External on asm.com).

⁴ The only exceptions are if ASM is under a legal or regulatory obligation to disclose the information; or you filed a Report in bad faith. In both these cases, disclosure of any personal data will only take place to the extent necessary to comply with applicable law or take the appropriate measures in respect of any bad faith reporting.

9. External Reporting

ASM prefers that you report incidents using our internal Speak Up Procedure as ASM is responsible for resolving incidents. However, you may also have a legal right to use external reporting channels.

Where to go for additional information?

- your (local) HR Business Partner, (local) Ethics member or ambassador or (local) in-house lawyer, the General Counsel/Global Compliance Officer; or
- ASM intranet: Ethics Portal

Overview

Annex 1: Our external Speak Up service

Annex 2: Sample (template) Report

Annex 3: Investigation by Ethics Committee

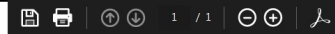
Annex 4: Country Level Deviations and External Reporting Lines

Annex 1: Our external Speak Up service:

Here you can type your Report or call tollfree and tell your story in your own language.

Country	Free phone Num	Webservice URL	Access code*
CHINA SOUTH	108004400179	www.speakupfeedback.eu/web/fruz5r/cn	90401
CHINA NORTH	108004400179	www.speakupfeedback.eu/web/fruz5r/cn	90401
FRANCE	08001-13031	www.speakupfeedback.eu/web/fruz5r/fr	41963
GERMANY	0800-1801733	www.speakupfeedback.eu/web/fruz5r/de	91488
IRELAND	1800-552136	www.speakupfeedback.eu/web/fruz5r/ie	47244
ISRAEL	1809444260	www.speakupfeedback.eu/web/fruz5r/il	27177
BELGIUM	800-71365	www.speakupfeedback.eu/web/fruz5r/be	10481
ITALY	800-787639	www.speakupfeedback.eu/web/fruz5r/it	383
JAPAN	0120 774878	www.speakupfeedback.eu/web/fruz5r/jp	51438
KOREA (SOUTH)	7984424261	www.speakupfeedback.eu/web/fruz5r/kr	41716
MALAYSIA	1-800-88-4307	www.speakupfeedback.eu/web/fruz5r/my	70346
NETHERLANDS	0800 0222931	www.speakupfeedback.eu/web/fruz5r/nl	66693
SINGAPORE	1800-8232206	www.speakupfeedback.eu/web/fruz5r/sg	85825
TAIWAN	801444317	www.speakupfeedback.eu/web/fruz5r/tw	93846
UNITED KINGDOM	0800-1693502	www.speakupfeedback.eu/web/fruz5r/gb	54116
USA	1-866-2506706	www.speakupfeedback.eu/web/fruz5r/us	69376

69 in



Annex 2: Sample (template) Report

You can use this template to file a Report with your direct manager (or his/her manager), with your (local) HR Business Partner, with the Ethics Committee, your (local) Ethics member or ambassador or via ComplianceOfficer@asm.com. Use of this template is optional; please feel free to use any format you feel comfortable with.

Any personal information you provide will be processed solely for the purposes of the Speak Up Procedure and in accordance with ASM's employee privacy notice.

Do you want your identity to remain confidential?

Please note that the recipient of this Report (your direct manager, the HR Business Partner, or local Ethics member or ambassador) will be aware of your identity. He/she will not share your identity unless you give your permission to do so. If you prefer to remain anonymous you can use the external Speak Up line or web service (see Annex 1).

I give permission to the recipient of this form to share my personal information with those who are directly involved in the investigation of the possible violation described in this form.

Yes

No

Personal information

Your name (first and last name):

Enter text.

Your preferred phone number (this may be your private phone number):

Enter text.

Your preferred e-mail address (this may be your private email address):

Enter text.

Best time to communicate with you (including time zone you are in): Enter text.

Best way to communicate with you:

Phone:

E-mail:

in person:

Name of your operating company / corporate department:

Enter text.

Report of possible violation

What is the possible violation of law or our Code of Business Conduct or other rule you want to report?

Enter text.

When did it occur? (Please estimate if exact dates are not known)

Enter text.

Where did it occur? (Please fill in the location, document or transaction, as applicable)

Enter text.

Who, in your opinion, are the persons involved? (Please fill in the first and last names and functions to the fullest extent possible)

First name – last name – function

- | | | |
|---------------------|-----------------|----------|
| 1. Enter first name | Enter last name | Function |
| 2. Enter first name | Enter last name | Function |
| 3. Enter first name | Enter last name | Function |
| 4. Enter first name | Enter last name | Function |

What, in your opinion, is the potential damage (financially or otherwise) to ASM? (To the extent you have visibility on this)

Enter text.

Do you think it will happen again?

No

Yes

Not sure

Personal action

How did you become aware of the

situation? Enter text.

Have you reported the situation to anyone else within ASM first? No, why not:

Enter text.

Yes, the outcome was (please include name(s) of person/people to the extent you feel comfortable with that):

Enter text.

Do you know of any other person(s) who is/are aware of the situation, but who is/are not personally involved? (please include name(s) of person/people to the extent you feel comfortable with that)?

No

Yes (please include name(s) of person/people to the extent you feel comfortable with that)

Enter text.

Do you have any physical evidence, which you can share with the investigators? (Please only provide evidence you have readily available, please do not investigate yourself; we leave that to experienced investigators)

No

Yes (please describe the physical evidence, such as documents, you may have):

Enter text.

Please provide any additional information you have which you believe may be relevant:

Enter text.

Thank you!

Annex 3: Investigation by Ethics Committee

The Ethics Committee consists of the Head of Global Human Resources, other HR Directors, the General Counsel/Global Compliance Officer and Heads of Internal Audit and Corporate Social Responsibility. The Ethics Committee reports directly to the Chief Executive Officer and the Chief Financial Officer.

Where your identity and contact details are known to us, or where if you have made a notification through the Speak Up line and left your contact details there – you will receive acknowledgement of receipt from the Ethics Committee within 7 days of submission.

The Ethics Committee will have each reported case screened and will determine whether it gives rise to a reasonable suspicion of a violation of our Code of Business Conduct, and/or its underlying policies; and whether a different procedure applies (e.g. annual appraisals or QHSSE). Where reasonably possible and if your identity and/or contact details are known, you will be informed as to whether the matter will be investigated further or not and whether a different procedure may apply or an alternative route has been chosen. Reports regarding personal inappropriate behavior will generally be handled differently from reports regarding violations where more than a single person or even the company is affected (e.g. fraud, anti-competitive or corrupt behavior). Inappropriate behavior in the workplace, such as intimidation, harassment, discriminatory remarks etc., may be better addressed by de-escalating. This could include mediation, or a workshop with the department about respectful workplace behavior, or offering coaching or training to the accused. Reports that qualify for further investigation will be investigated under instruction from the Ethics Committee which may delegate this task to one or more of its members or others (which may include third parties). The Ethics Committee can appoint one or more investigators. The investigators have the authority to instruct others to take temporary measures (e.g. in order to ensure that physical evidence or digital information is properly safeguarded). Employees are required to cooperate with an investigation and to provide any available information and documentation requested by an investigator.

Where (i) reasonably possible and where (ii) your identity and contact details are known to us or where you have made a notification through the Speak Up line and left your contact details there, within 3 months of the date that you filed your Report, the investigator(s) will inform you of the status of the investigation. If they cannot provide that information within 3 months, they will give you a new date when you may expect to receive a status update. Please note that the status update will only be an update on the status of the investigation and will not include any details relating to the investigation or any persons being investigated.

In case your Report raised a concern about (a) specific person(s), this/these person(s) will be informed by the investigator about the suspected violation during the course of the investigation. ASM will ask the person(s) to give their view on the alleged facts and – at a later stage – on the results of the investigation. This/these person(s) will not be directly informed about your identity without your prior permission.

The results of the investigation are presented to the Ethics Committee which passes judgement on the matter. If the Ethics Committee concludes that concerns you raised in your Report are (partly)

well-founded (i.e., a violation of our Code of Business Conduct or its underlying policies has taken place) then it will decide on appropriate remedial measures. These can include disciplinary measures against the offender(s) and/or organizational measures (i.e. processes and procedures) to prevent such an incident from happening again. The appropriate management level within ASM will be instructed by the Ethics Committee to execute the remedial measures. The Ethics Committee will monitor that its instructions are executed properly.

Finally, where possible and appropriate, you will be informed as to whether a violation was found and, if so, that a decision was taken by the Ethics Committee. This feedback and information about measures taken will be given to you by your local contact person (unless you decided to report directly via email, then you will be informed via e-mail or unless you reported through the Speak Up line in which case you will be informed through that. No further details can be given in view of both the privacy and legal position of the person(s) that your Report was about.

If, after careful consideration, you as the reporter feel that your Report has not been investigated carefully or not been performed correctly in line with this Procedure, you should inform the Ethics Committee directly (EthicsCommittee@ASM.com) or the Chair of the Supervisory Board (Chair.Supervisoryboard@asm.com).

Annex 4: Country Level Deviations and External Reporting Lines

This Annex provides an overview of deviations under local laws.

1. Finland

The following applies to those based in Finland:

External reporting Channel

The Office of the Chancellor of Justice (the “Chancellor”) operates as the centralized external reporting channel in Finland. The Chancellor does not investigate the reports but instead forwards them to the competent authorities or ministries for investigation. You are entitled to whistleblower protection under the following circumstances when reporting to the Chancellor:

- You have not been given the possibility to report through an internal notification channel;
- You have reasonable grounds to believe that the internal report has not been acted upon within three (3) months from the acknowledgement of receipt;
- You have reasonable grounds to believe that the infringement cannot be effectively addressed on the basis of the internal report; or
- You have reasonable grounds to believe that you are at risk of retaliation as a result of the report.

Please see the detailed information about how to make a report to centralised external reporting channel on the Chancellor’s website <https://oikeuskansleri.fi/miten-ilmoitus-tehdään>.

2. Ireland

What Reports attract Whistleblower Protection?

Breaches including any unlawful act or omission contrary to rules contained in the EU legislation referred in the Annex to the Whistleblowing Directive under the following headings (“**Breaches of EU Law**”):

- (a) public procurement;
- (b) financial services, products and markets, and prevention of money laundering and terrorist financing;
- (c) product safety and compliance;
- (d) transport safety;
- (e) protection of the environment;
- (f) radiation protection and nuclear safety;
- (g) food and feed safety, animal health and welfare;
- (h) public health;
- (i) consumer protection;
- (j) protection of privacy and personal data, and security of network and information systems;

- (k) acts or omissions contrary to and detrimental to the financial interests of the European Union referred to in Article 325 of the TFEU; and
- (l) acts of omissions contrary to internal market rules referred to in Article 26 (2) of the TFEU including breaches of Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.

Or

- (m) an act or omission that defeats the object or purpose of the rules in the Union acts and areas referred to above from (a) to (l);

and the following:

- (a) that an offence has been, is being or is likely to be committed;
- (b) that a person has failed, is failing, or likely to fail to comply with any legal obligation (other than one arising under the worker's contract of employment or terms of engagement);
- (c) that a miscarriage of justice has occurred, is occurring or is likely to occur,
- (d) oppression, discrimination, gross negligence or gross mismanagement by or on behalf of a public body
- (e) a breach has occurred is occurring or is likely to occur; or
- (f) that the health and safety of any individual has been, is being or is likely to be endangered;
- (g) that the environment has been, is being or is likely to be damaged;
- (h) that an unlawful or improper use of public money has occurred, is occurring or is likely to occur;
- (i) information tending to show any matter falling within any of the preceding bullet points has been, is being, or is likely to be concealed or destroyed

Ireland-only Local Reporting Channel Details

ASM strongly encourages and expects you to report any wrongdoing via the Speak Up Procedure described above in the main procedure. If you wish to report locally and have the matter dealt with locally the contact details are as follows:

- To make an oral report please call +353 6219100 to set up a meeting or call with Mr. Connell.
- To make a written send an email directly to Country_Representative_Ireland@asm.com .
- To make a report in person please request a physical meeting with Mr. Connell.

External reporting Channels Ireland

You are encouraged and it is ASM's preference that you report wrongdoing **internally** in accordance the main procedure or, if you prefer to have the matter dealt with entirely at a local level then through the Irish-specific reporting channels above.

However, under the law you also have the possibility to report to the Protected Disclosures Commissioner. A list of ‘prescribed persons’ for specific matters is available on the Irish Government’s website [here](#).

The contact details for the Protected Disclosure Commissioner are as follows:

Protected Disclosures Commissioner
 By Email: info@opdc.ie
 By Phone: 01 639 5650.
 At the website: <https://www.opdc.ie/how-to-report-wrongdoing/>

3. Italy

The purpose of this annex is to provide an overview of any deviations that the Italian Legislative Decree No. 24/2023 (hereinafter, the "**Whistleblowing Decree**") has made from the stipulations of the European Directive of 23 October 2019 on the protection of persons who report breaches of Union law (2019/1937). See below requirements for Italy:

External Reporting Channel

You are encouraged and it is ASM’s preference that you report wrongdoing in accordance with the main procedure.

Notwithstanding section 5 of this Speak Up Procedure, you are allowed to submit an external report to the competent authority in the following cases expressly indicated by the Whistleblowing Decree:

- ASM’s internal reporting system is not active, available or it does not comply with the requirements provided for the Whistleblowing Decree;
- you already submitted an internal report that has not been followed up by ASM;
- you have reasonable grounds to believe that your report will not be effectively followed up by ASM or that such report may result in the risk of retaliation; and
- you reasonably believe that the breach may cause an imminent or obvious risk for the public interest.

The authorities competent for receiving an external report

In Italy the authority responsible for receiving external reports, reporting feedback, and providing follow-up on such external reports is the National Anticorruption Authority (Autorità Nazionale Anticorruzione (ANAC) – ANAC | Home page - www.anticorruzione.it).

4. The Netherlands

You will be protected in case you directly report a major integrity case (*misstand*) with societal impact (e.g. violation of a law or internal procedures, threat to safety of persons, public health environment or proper functioning of the organization which in each case has a societal impact) or violation of certain EU laws as set out in Dutch law. The local person you can contact is the Global Compliance Officer, whom you can contact at ComplianceOfficer@asm.com and who is located in Almere.