ACM RESEARCH, INC.

Environmental Policy

(As updated September 2026)

ACM Research, Inc., ("ACM"), is committed to achieving resource conservation, environmental protection, and sustainable development through technological innovation and corporate practices.

This policy aims to articulate ACM's commitments and requirements in environmental management, ensuring comprehensive and effective management of environmental risks and opportunities, and promoting the continuous improvement of environmental performance.

In addition to its environmental commitments relating to its own operations and supply chain, ACM seeks to support more environmentally responsible semiconductor manufacturing through product innovation. Recognizing that semiconductor manufacturing processes inherently require substantial quantities of chemicals, including potentially hazardous substances, ACM invests significantly in research and development to develop products designed with environmental considerations in mind. These products not only meet customers' demanding performance requirements but also help customers improve resource efficiency and reduce the consumption of hazardous chemicals in their operations.

Scope of Application

This policy applies to ACM's global R&D centers, manufacturing sites, and related business operations, covering relevant activities such as products and services, logistics and transportation, waste management, etc.

Given that ACM conducts its business operations principally through its subsidiary ACM Research (Shanghai), Inc., ("ACM Shanghai"), the company's environmental targets are primarily implemented through ACM Shanghai while being applicable across ACM's overall operational boundary.

The company expects third-party partners, including suppliers, service providers, distributors, contractors, and other business partners, to comply with this policy or equivalent environmental standards.

Environmental Governance Framework

ACM has established a robust environmental governance framework, with the company's Board of Directors and senior management holding ultimate oversight responsibility for environmental and climate management.

- **Board of Directors:** Responsibilities include reviewing and approving environmental and climate-related policies and targets, overseeing resource allocation, assessing significant environmental risks, and integrating environmental considerations into the company's overall strategy and investment decisions.
- **Senior Management:** Responsibilities include fostering cross-departmental collaboration, implementing day-to-day management initiatives, and ensuring that environmental goals are closely aligned with business plans to enhance the overall effectiveness of environmental governance.

ACM is dedicated to continuously improving environmental performance by

systematically identifying and addressing environmental and climate-related risks and opportunities, promoting low-carbon transition, enhancing water and waste management efficiency, ensuring chemical safety, engaging stakeholders, avoiding fossil fuel-related investments, and increasing the share of renewable energy, with the ultimate goal of achieving green and sustainable development.

Environmental Management Practices

Climate Change Mitigation and Adaptation

ACM recognizes that climate change presents both risks and opportunities that may affect its long-term business resilience and sustainability. The company has integrated climate-related risk identification, assessment, and management processes into its overall enterprise risk management framework.

The board provides oversight of climate-related risks and opportunities by reviewing the company's climate strategy, risk management approach, and progress in addressing climate-related issues. Management is responsible for assessing and managing climate-related risks and opportunities by integrating climate considerations into business planning, risk management processes, and operational decision-making. Material climate-related risks and opportunities are communicated to senior management and the board to support informed decision-making.

By systematically identifying climate-related physical risks (e.g., extreme weather events affecting facilities and infrastructure) and transition risks (e.g., carbon pricing mechanisms, regulatory changes, and technological shifts), ACM develops and implements climate risk management and opportunity-capturing measures. The company has also established robust disaster recovery and business continuity plans to ensure stability in production and R&D during extreme weather events.

ACM supports the goals of the *Paris Agreement*, pledges not to invest in fossil fuel expansion projects, and will not participate in or fund activities that deny the scientific consensus on climate change, ensuring independence and credibility in climate action.

Target: By 2030, the company aims to reduce scope 1 and scope 2 greenhouse gas emissions intensity by 5% from the 2025 baseline.

Energy Consumption

In response to increasingly stringent carbon emissions regulations, ACM continuously optimizes its energy structure, identifies energy-saving potential, implements energy efficiency projects, and actively deploys low-carbon technologies and renewable energy solutions. The company is steadily increasing the share of renewable energy in its energy mix to achieve ongoing optimization of energy use and effective reduction of greenhouse gas emissions.

Target: By 2030, the company aims to reduce comprehensive energy consumption intensity by 10% and increase the proportion of green electricity consumption in total electricity consumption to 10% from the 2025 baseline.

Water Utilization

ACM is committed to responsible management and protection of water resources. By optimizing production processes and equipment configurations, the company continuously reduces water consumption and wastewater discharge (wastewater may contain hazardous substances such as antimony, arsenic, hydrofluoric acid, and hydrogen peroxide). The company also promotes water recycling and the application of advanced wastewater treatment technologies.

Target: By 2030, the company aims to reduce water consumption intensity by 10% from the 2025 baseline.

Air Pollution Management

ACM is committed to minimizing air emissions and environmental nuisances associated with its operations. The company implements appropriate processes and controls to prevent and reduce potential air pollutants and conducts relevant monitoring and evaluation to ensure compliance with applicable environmental requirements. ACM also takes measures to manage noise and other operational impacts and continuously improves its practices to reduce environmental impacts.

Waste Management

ACM adheres to international electronic waste management standards, such as the WEEE Directive, covering business operations, production, packaging, and the entire product life cycle. The company ensures that electronic equipment procurement meets environmental standards, promotes eco-friendly design to minimize waste generation, enforces strict waste classification and recycling, encourages the use of recyclable materials in packaging, and supports product recycling and environmentally sound disposal.

Target: By 2030, the company aims to reduce hazardous waste generation intensity and non-hazardous waste generation intensity by 10% from the 2025 baseline.

Chemical Safety

ACM has established a comprehensive chemical safety management system to strictly control the procurement, storage, use, and disposal of hazardous chemicals in compliance with relevant regulations and safety standards. The company conducts assessments to identify and manage risks associated with the use and inclusion of hazardous chemicals in its products and processes, and implements appropriate control measures to reduce potential impacts on human health and the environment.

The company emphasizes R&D and application of environmentally friendly cleaning technologies, promoting low-toxicity and low-consumption alternatives such as diluted hydrofluoric acid, RCA SC-1 solution, and ozonated deionized

water, while developing innovative technologies that significantly reduce the use of traditional sulfuric acid and hydrogen peroxide.

Customer Health and Safety

ACM is committed to ensuring the safety and reliability of its products and supporting customers in the safe operation and use of its equipment. The company provides relevant product information, technical support, and safety guidance to customers, and maintains processes to collect and address customer feedback regarding product safety. ACM continuously evaluates potential health and safety risks associated with its products and implements appropriate measures to enhance product safety and customer protection.

Supplier Environmental Responsibility

ACM recognizes the importance of promoting environmental responsibility throughout its supply chain. The company expects suppliers and business partners to comply with applicable environmental laws and regulations and encourages them to adopt responsible environmental practices, including reducing environmental impacts, improving resource efficiency, and managing environmental risks associated with their operations.

ACM incorporates environmental considerations into supplier management processes and monitors relevant supplier environmental performance. Where environmental non-conformities are identified, the company encourages suppliers to implement appropriate corrective actions and improve their environmental practices.

Stakeholder Engagement

ACM is committed to engaging with relevant stakeholders, including employees, suppliers, customers, business partners, regulatory authorities, and local communities, to enhance its environmental management practices.

Improvement and Oversight

ACM has established grievance and reporting mechanisms to ensure that employees, contractors, and other stakeholders can report, without fear of retaliation, any violations of this policy or other environmental requirements, and raise, resolve, or escalate environmental issues until they are properly addressed.

ACM's senior management is responsible for overseeing the review and update of this environmental policy and related governance practices. The company regularly reviews and updates these policies to ensure continued alignment with applicable laws, regulatory requirements, and evolving environmental and business risks.

This policy has been approved by the Board of Directors of ACM Research and will be updated as appropriate in response to regulatory changes, business developments, and other factors.