

ACM RESEARCH, INC.

Environmental Policy

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.

Scope of Application

This policy applies to ACM’s global R&D centers, manufacturing sites, and related business operations, covering topics including climate change mitigation and adaptation, energy consumption, water utilization, waste management, and chemical safety.

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 the risks and opportunities posed by climate change and has established a board-lead climate governance structure to ensure alignment between climate and corporate strategies.

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.

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.

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.

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.

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 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.

Stakeholder Engagement

ACM actively engages with government regulators, customers, and local communities to communicate and respond to environmental and climate-related concerns. The company advocates compliance with environmental laws and regulations throughout its supply chain, promotes green procurement, requires suppliers to establish and maintain sound environmental management systems, continuously improve environmental performance, proactively manage climate risks, optimize resource utilization, and reduce environmental impacts.

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.

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.