

ACM RESEARCH, INC.

Sustainable Procurement Policy

ACM Research, Inc., (“ACM”), is committed to promoting sustainable supply chain management by collaborating with suppliers to establish a responsible, resilient, transparent, and sustainable supply chain globally. Through responsible procurement practices, ACM seeks to advance sustainable development across its value chain and promote environmental, social, and ethical standards among its business partners.

Guiding Principles

This policy is developed with reference to internationally recognized principles, standards, and guidance, including the *Universal Declaration of Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work*, the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Due Diligence Guidance for Responsible Business Conduct*, and the *ILO Core Conventions*.

Scope of Application

This policy applies primarily to suppliers providing products and/or services to ACM, including manufacturers, service providers, distributors, contractors, and other relevant third parties.

ACM expects suppliers and other business partners to comply with this policy or equivalent standards and to establish appropriate management practices to support responsible and sustainable supply chain operations. Suppliers shall comply with applicable laws and regulations in the jurisdictions where they operate. Where this policy establishes higher standards and such standards are legally permissible, suppliers are expected to follow the more stringent requirements and uphold internationally recognized principles.

Given that ACM conducts its business operations principally through its subsidiary ACM Research (Shanghai), Inc., (“ACM Shanghai”), the company’s sustainable procurement targets are primarily implemented through ACM Shanghai while being applicable across ACM’s overall operational boundary.

Sustainable Procurement Framework

ACM has established a robust governance structure for sustainable procurement, with the Board of Directors providing oversight and senior management responsible for implementation and continuous improvement. The company’s operating subsidiary has developed a supplier management framework covering supplier onboarding, evaluation, engagement, and exit, supported by relevant policies and procedures, including the *Supplier Management Requirements*, *Procurement Management Requirements*, *Supplier Admission Rules*, and *Supplier Performance Evaluation System*. ACM’s operating subsidiary also conducts supplier due diligence through the *Supplier Questionnaire* to identify and manage supply chain risks.

Sustainable Procurement Mechanisms

ACM has established supplier assessment and qualification mechanisms to review suppliers’ production capabilities, quality management systems, environmental

management measures, and labor management practices.

Suppliers are required to provide valid supporting documentation and execute relevant compliance documents to demonstrate compliance with requirements relating to environmental protection, employment practices, human rights, health and safety, and standards of ethical business conduct.

ACM also requires key suppliers to provide relevant supply chain information, including lists of relevant sub-tier suppliers, to assist with supply chain mapping, support the identification of relevant mineral sources, reduce the risk of procuring or using conflict minerals, and reduce the risk of procuring raw materials or components parts produced with forced labor or child labor or otherwise in violation of applicable laws, rules, regulations, or global standards.

Before entering into a business relationship, ACM's operating subsidiary generally requires certain suppliers to execute documents such as an *Integrity Agreement* and a *Declaration of No Affiliation or Conflict of Interest*. ACM also includes anti-bribery provisions in supplier contracts and strictly prohibits any form of commercial bribery during contract engagement, negotiation, execution, and performance.

Sustainable Procurement Requirements

Labor and Human Rights

Child Labor, Forced Labor, and Human Trafficking: Suppliers shall: (a) comply with all laws and regulations protecting human rights, including laws and regulations pertaining to child labor, forced labor, and human trafficking; (b) not directly or indirectly engage in, support, benefit from, or tolerate any form of child labor, forced labor, or human trafficking in the supply chain; (c) implement and conduct risk screening and due diligence procedures in procurement, sourcing, and supply chain activities to establish reasonable assurance of no upstream child labor, forced labor, or human trafficking; (d) investigate any allegations, events, or reports of child labor, forced labor, or human trafficking in the supply chain; (e) remediate any identified risk of child labor, forced labor, or human trafficking in the supply chain, including development of a formal written action plan for such remediation, up to and including termination of the supplier relationship at issue and identification and engagement of a suitable alternative supplier, and notification of authorities as needed; and (f) undertake commercially reasonable efforts to include provisions expressly prohibiting child labor, forced labor, and human trafficking in every sub-supplier contract, including obligations for each sub-supplier in turn to implement policies and procedures to detect and prevent child labor, forced labor, and human trafficking, including requirements regarding due diligence and documentation, risk identification, risk mitigation, and training. Suppliers shall maintain complete age documentation of employees to ensure compliance with applicable laws and regulations. Suppliers shall ensure that workers are allowed to move around freely, leave their place of work when their shifts end or after giving reasonable notice and be free to terminate their employment in a manner consistent with local laws.

Anti-Discrimination and Anti-Harassment: Suppliers shall prohibit all forms of discrimination, harassment, and abuse in the workplace. Suppliers shall not discriminate against or engage in unfair treatment based on age, gender, ethnicity, marital status, nationality, race, religion, sexual orientation, disability status, or other legally protected characteristics. Suppliers shall not threaten workers or subject them to any form of

inhumane treatment, including but not limited to verbal abuse, harassment, corporal punishment, mental coercion, or sexual harassment.

Working Conditions: Suppliers shall comply with applicable laws and regulations regarding working hours, rest periods, overtime, wages, and benefits. Suppliers shall ensure that workers receive wages no less than the applicable statutory minimum wage, legally required benefits, and overtime compensation where applicable. Mandatory overtime is prohibited. Suppliers shall communicate employment terms clearly, pay wages and benefits accurately and on time, and shall not use wage deductions as a disciplinary or punitive measure. Suppliers may not impose monetary fines or retain employees' original identity papers or any other original official documentation. Suppliers may not see remuneration from employees or require recruitment deposits or any other constraints as conditions of employment.

Freedom of Association and Collective Bargaining: Suppliers shall respect workers' rights to freely join trade unions and engage in collective bargaining in accordance with applicable laws and regulations. Suppliers shall also establish effective mechanisms between workers and management, enabling workers to freely express their views and raise grievances without fear of discrimination, retaliation, threats, or harassment.

Health and Safety: Suppliers shall safeguard workers' occupational health and safety. Suppliers shall comply with applicable occupational health and safety requirements, establish effective safety management systems, provide necessary safety facilities and personal protective equipment, and implement appropriate measures to prevent workplace risks and protect workers' health and safety. There is a commitment to emergency preparedness, industrial hygiene, sanitation, humane housing conditions, and providing employees with clean drinking water and sanitary living and working spaces.

Environmental Protection

Suppliers should establish metrics and demonstrate continuous improvement in the following areas through periodic monitoring and audits.

Environmental Permits: Suppliers must comply with all environmental laws and regulations and obtain all relevant environmental and government permits, registrations, and licenses to support their business operations.

Greenhouse Gas (GHG) Emissions: Suppliers need to make a reasonable effort to minimize energy, water, and raw material usage.

Water, Pollutants, and Waste: Suppliers should control and properly treat all wastewater and solid waste. They should also make a reasonable effort to minimize air and water pollution. And influence sub-suppliers to improve their environmental credentials and performance.

Business Ethics

Anti-Bribery and Anti-Corruption: Suppliers shall uphold high standards of business ethics. Suppliers shall not offer, promise, give, solicit, or accept bribes, gifts, kickbacks, or any other improper benefits to obtain or retain business or secure an improper advantage. Suppliers are strictly prohibited from offering, promising, giving, or authorizing the giving of anything of value to any ACM employee that could be perceived as inducing action or inaction or influencing the ACM employee to use discretion to favor the supplier. Reasonable, non-lavish business meals or entertainment may be provided up

to the limits set forth in ACM's own policies and procedures. Any such offer, promise, or gift from a supplier or other person on behalf of a supplier must be reported to the Chief Financial Officer by the employee who receives it and cannot accept it without advance written approval. Similarly, where an ACM employee solicits a bribe or makes any other improper request during business dealings, suppliers must report the matter through ACM's designated reporting channels. All parties must follow anticompetitive practices (e.g., no price fixing, collusion, complementary bidding, or other bid rigging of any kind).

Information Security: Suppliers shall establish effective information security management systems and implement appropriate measures to identify, assess, and manage information security risks. Suppliers shall protect confidential information, trade secrets, personal data, and other sensitive information from unauthorized access, use, disclosure, alteration, loss, or misuse, and shall not disclose such information except as authorized or required by applicable laws and regulations.

Conflict Minerals

Suppliers shall avoid sourcing conflict minerals and establish due diligence procedures for mineral supply chains with reference to the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* or other internationally recognized frameworks. Suppliers shall identify, assess, and manage the risk that minerals contained in raw materials or components originate from conflict-affected and high-risk areas and implement appropriate measures to prevent and mitigate such risks.

International Trade Compliance

Suppliers must obey all trade laws, directives, and regulations and shall not provide to ACM any goods or services from a country, person, or entity that is subject to U.S., E.U., or other regional, unilateral, and multilateral regulations that restrict transactions with specific persons, entities, or countries. Accordingly, Suppliers shall implement compliance processes to screen its employees, suppliers, vendors, agents, and other business associates involved in any transaction to provide goods or services connected in any way with ACM's business to ensure compliance with such laws, directives, or regulations concerning sanctions.

Stakeholder Engagement

ACM is committed to engaging with relevant stakeholders, including employees, suppliers, and business partners, in the development, implementation, and continuous improvement of its sustainable procurement policies and practices.

Improvement and Oversight

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

Similarly, suppliers are expected to periodically evaluate their operations to ensure compliance with this Policy and all applicable laws, rules, directives, and regulations.

Suppliers must maintain complete and accurate records, including records demonstrating compliance with this Policy and all applicable laws, rules, directives, and regulations.

Investigation, Remedial Action, and Reporting

Suppliers shall investigate any allegations, events, or reports of actual or suspected violations of this Policy, remediate any such identified risk, including through the development of a formal written action plan for such remediation, up to and including termination of any implicated third-party relationships and identify and engage suitable alternatives.

Suppliers shall notify ACM in writing within three business days after becoming aware of any allegations, events, or reports of violations of this Policy.

Audits

Upon written request from ACM, suppliers shall cooperate in independent third-party audits of its supply chain to verify implementation of compliance procedures consistent with this Policy, including (i) results of risk screening and due diligence activities, (ii) age, hours, and wage documentation for employees, (iii) supply chain traceability documents; (iv) audits or reports regarding the ethics, integrity, safety, or other reputational risks associated with sub-suppliers or their respective supply chains, (v) results of any investigation involving allegations, events, or reports of violations of this Policy, (vi) any action plan for remediating any identified risk of violations arising in connection with this Policy; and (vii) any further documentation reasonably necessary to fulfill or demonstrate compliance with obligations under this Policy.

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.