



# Grievance Procedure

December 31, 2025



**Message from the CEO and Chairman of the Board of Management of  
BE Semiconductor Industries N.V. (“Beside”)**

Beside’s mission is to become the world’s leading supplier of semiconductor assembly equipment for advanced packaging applications and to exceed industry average benchmarks of financial performance. We also strive to create long-term value for our stakeholders and operate our business in a sustainable way, respecting the environment, our own employees and the wider society. Beside is committed to running its operations in accordance with internationally recognized standards and best practices and to promote sustainability with all stakeholders through the reporting on material sustainability topics on an annual basis in line with regulatory standards.

We aim to offer a working environment where all our employees feel safe and secure. Everyone has the right to join a legally recognized trade union. Everyone has the right to a healthy work-life balance. And everyone has the right to work in a place that is free from harassment, intimidation, or any kind of psychological or physical violence.

Beside has implemented a Whistleblower Procedure to report on any issues related to our Code of Conduct. In addition, this Grievance Procedure looks to provide a transparent and efficient process to address any complaints from our employees, workers in the value chain and any other relevant stakeholders.

We strongly encourage you to speak up in case you experience any issues related to your working environment, working relation, corporate culture and any other concerns that may affect your relationship with Beside. Such open and transparent communication can help us improve our company. We strive to protect all complainants in good faith, with this policy based on a non-retaliation approach.



## 1. Purpose of this Grievance Procedure

Besil aims to develop its business in a socially responsible manner for the benefit of all stakeholders, employees, partners, suppliers, customers, and the local communities. We encourage a corporate culture in which our employees feel comfortable raising questions and concerns related to any aspects of their employment and working environment.

The purpose of this Grievance Procedure is to provide a transparent, fair, and efficient process for addressing grievances from employees, customers, suppliers, and other stakeholders. This process ensures that all grievances are resolved in a timely and satisfactory manner, in alignment with Besil's commitment to conduct its business in a socially responsible manner.

## 2. Scope

This Grievance Procedure applies to all Besil's employees, contractors, sub-contractors, consultants, interns, and temporary workers. It applies also to the employees of our suppliers and other workers in our value chain as well as to the other stakeholders who have business relations with Besil or an interest in improving Besil's business.

Grievances can include any issues related to:

- Workplace environment
- Working relations
- Working conditions
- Work-life balance
- Corporate culture
- Reasonable compensation
- Employment conditions
- Minor concerns related to health and safety
- Product or service quality
- And any other concerns that may affect the stakeholder's relationship with the company.

This Grievance Procedure excludes topics related to Besil's Code of Conduct covered by the Whistleblower Procedure. In case of suspicion on misconduct in respect of the below mentioned topics, please follow Besil's Whistleblower Procedure to submit your complaint or report about a potential issue:

- Human rights violations
- Fraud financial reporting, inadequate financial and non-financial recordkeeping
- Money laundering
- Insider trading
- Gifts and entertainment rules violations
- Bribery or corruption
- Criminal offences
- Privacy violations



- Conflicts of interest
- Disclosure of confidential information
- Discrimination, aggression and harassment (including sexual harassment)
- Retaliation against anyone for speaking up in good faith
- Improper use of company resources
- Major environmental, health and safety issues

We strive to make sure that all grievances are reported, reviewed and resolved. If you are not sure which instrument to use in your situation we advise the following steps:

1. Read Besi' Code of Conduct and Whistleblower Procedure available at our website [Corporate Governance | Besi](#) and this Grievance Procedure.
2. Use your best judgement which channel should be used to submit your complaint (Whistleblower Procedure or Grievance Procedure).

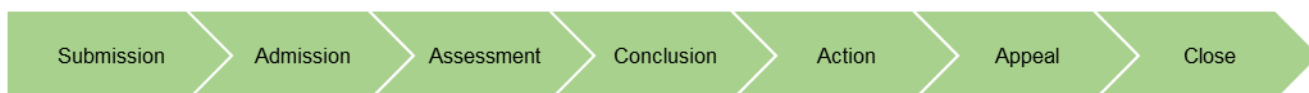
The general rule is that grievance is a matter of a personal interest that does not have impact on the wider public. A whistleblower procedure provides the framework for dealing with serious concerns affecting the wider public and is mainly focused on bringing unethical and potentially illegal behavior to the attention.

### 3. Definitions

Grievance:	A complaint or concern raised by an employee or a stakeholder regarding any aspect of the company's operations. For the list of topics covered by the Grievance Procedure refer to the Chapter 2 "Scope".
Complainant:	The person or entity raising a grievance.
Ethics Counselor:	An appointed individual responsible for handling grievances at corporate level within Besi.
Confidentiality Counselor:	The individuals designated by Besi in each country/region of operations to act as such in Besi's organization. The Confidentiality Counselors can be approached by Besi employees willing to discuss their grievances informally.
Ethics Committee:	A group of individuals within Besi designated to review and resolve a grievance. The Ethics Committee is assigned for each individual grievance that is formally submitted, includes the Ethics Counselor and may further include members of the Internal Control and HR teams.



#### 4. Description of the procedure



##### Submission of Grievance

Employees and other stakeholders are encouraged to resolve grievances informally by discussing the issue with their supervisor/manager. This can often result in fast and effective solutions. For Besil employees another opportunity to resolve their grievance informally is to reach out to the Confidentiality Counselor or to the relevant local contact person from the persons listed in the Annex to this Grievance Procedure.

If the grievance cannot be resolved informally, the complainant can formally submit a grievance using our Grievance Procedure as described below in this document. The grievance can be submitted via:

- Email to [ethics.counselor@besil.com](mailto:ethics.counselor@besil.com)
- Through the phone number (+31) 683 046581

Before the submission of a grievance, we advise you to consider the following questions:

Would you like to be anonymous?	State in your email that you would like to be anonymous. Your name and contact details will not be disclosed in the process of grievance investigation.
Do you feel comfortable discussing your issue with your manager?	If yes, try to discuss the issue with your manager before submitting your grievance.  If you do not feel comfortable to do so, follow this policy to submit your grievance.
Are you not sure how to submit your grievance or what grievance submission mechanism to select (Whistleblower Procedure or Grievance Procedure)?	Read the following policies at <a href="#">Corporate Governance   Besil</a> : <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Whistleblower Procedure</li> <li>• Grievance Procedure</li> </ul>



### Admission

Upon receipt of the grievance by email, the Ethics Counselor will acknowledge the submission of your email.

The Ethics Counselor will make an initial assessment of your grievance within seven business days and based on the initial assessment the Ethics Counselor may do the following:

- Reach out to you directly to mediate in resolving the grievance.
- After discussion with you, send your grievance to an appropriate department or a person.
- If appropriate, forward your grievance through the Whistleblower Procedure or other reporting channels, which will be more efficient in handling your issue.
- Move your grievance to the next step “Assessment” where your case will be reviewed and analyzed by the Ethics Committee.

### Assessment

The way we approach the investigation depends on the nature of the reported issue. Some grievances can be solved without investigation with the support and mediation from the Ethics Counselor, while others may require an in-depth assessment. The Ethics Counselor will inform you regarding the expected approach and the steps that will be taken.

Principles of investigations:

1. Respect your right to be anonymous.
2. Respect your right to submit grievance in a good faith.
3. No retaliation.
4. Objective investigation.
5. Grievance cancellation at any point of the investigation.
6. Transparency. During the investigation process a complainant can inquire about the investigation status.

Internal assessment will be made by the members of the Ethics Committee that will be assigned for the investigation based on each specific complaint. The investigators will collect and review facts and supporting documents related to your grievance. To the maximum extent possible, the investigators will handle the matter confidentially and under the supervision of the Ethics Counselor.

The investigators may conduct interviews and meetings as part of the investigation. All employees are expected to cooperate with the investigation team and make sure that all information they provide to the investigators is correct and truthful.



Duration of the investigation will depend on each specific case and availability of information. At the “Admission” step you will be informed by the Ethics Counselor about the estimated duration of investigation. In case of any delays, the Ethics Counselor will communicate to you about such delays and reasons of the delays.

### Conclusion and action

The Ethics Committee will review the findings of the assessment and decide on the resolution of the grievance. In general, assessment will not typically take more than 30 business days from the date of submission.

Besic strives to resolve all conflicts in a mutually beneficial way. At the stage of Admission, the Ethics Counselor will assess the possibility to resolve the grievance by mediation. If at the Assessment stage it becomes evident that the case can be resolved by mediation, it is also communicated to the complainant. The Ethics Counselor or a member of the Ethics Committee can be selected as mediator based on the discussion with the complainant.

The Ethics Counselor will communicate the decision to the complainant, detailing the measures and actions to be taken. If further action is required, a timeline and responsible parties will be assigned.

If as result of the Assessment a violation of law or external regulations is confirmed, Besic may be required to report or notify the violation to relevant enforcement authorities in order to comply with the relevant law or regulation. Besic also has the right to start a separate legal action against the person(s) or party in question.

### Appeal

If the complainant is not satisfied with the conclusion, they may inform the Ethics Committee with explanation why they disagree with the outcome of the assessment. The Ethics Committee will discuss the appeal internally and based on each specific case will determine whether to, for example, provide additional explanations to the complainant or execute additional investigation to consider all aspects of the grievance.

### Closure

The grievance is considered closed when the resolution has been implemented and the complainant has accepted the outcome, or the Ethics Committee determines that the appeal process is complete. For each grievance submitted to Besic, we aim to assess how effective the remedy has been where it is possible. If the implementation of the remedy takes some time, we commit to communicate with the complainant to assess the effectiveness of the implemented measures.



## **5. Monitoring and Reporting**

The Ethics Counselor will maintain information about all submitted grievances and their resolutions. Quarterly reports are prepared for the Board of Management, summarizing the grievances received, their status, and any areas of concern.

## **6. Confidentiality and Non-Retaliation**

All grievances will be handled as confidentially as possible, with information only being shared on a need-to-know basis.

Besic prohibits all kind of retaliation against any individual for submitting a grievance in good faith or for participating in the investigation process.

## **7. Review and Continuous Improvement**

This Grievance Procedure will be reviewed annually to ensure its alignment with best practices and regulatory requirements. Our stakeholders are encouraged to provide feedback on the Grievance Procedure to facilitate continuous improvement.



## Annex: List of Contact Persons

Person	Position
Director Internal Audit and Control	Name: Hans Schepers Position: Director Internal Audit and Control Email: <a href="mailto:hans.schepers@besi.com">hans.schepers@besi.com</a> BE Semiconductor Industries N.V. Ratio 6, 6921 RW Duiven, the Netherlands
Risk Manager Asia	Name: Frederik Kerckhof Position: Risk Manager Asia Email: <a href="mailto:frederik.kerckhof@besi.com">frederik.kerckhof@besi.com</a> Besic Shanghai (Trading) Co. Ltd. 2/F (east), No. 32 Building, No. 76 Fu Te Dong San Road, Pilot Free Trade Zone, Pudong, Shanghai, China
Senior Manager Internal Control	Name: Edward Lee Position: Senior Manager Internal Control Email: <a href="mailto:edward.lee@besi.com">edward.lee@besi.com</a> Besic APac Sdn. Bhd. No. 3, Jalan 26/7, Seksyen 26, 40400 Shah Alam, Selangor, Malaysia
Senior Executive Internal Control	Name: Delia Zhang Position: Senior Executive Internal Control Email: <a href="mailto:delia.zhang@besi.com">delia.zhang@besi.com</a> Besic Leshan Co., Ltd. No. 8, Ying Bin Road High Tech Zone, Leshan, Sichuan, China 614012
Internal IT Auditor	Name: Sebastiaan Nijland Position: Internal IT Auditor Email: <a href="mailto:sebastiaan.nijland@besi.com">sebastiaan.nijland@besi.com</a> Besic Singapore Pte. Ltd. 1 Science Park Road Singapore Science Park 2, Capricorn Building #03-11
HR Switzerland	Name: Diona Ayar Position: HR Business Partner Email: <a href="mailto:diona.ayar@besi.com">diona.ayar@besi.com</a> Besic Switzerland AG Hinterbergstrasse 32a, 6312 Steinhausen, Switzerland
HR Austria	Name: Andrea Ascher Position: Manager Human Resources Email: <a href="mailto:andrea.ascher@besi.com">andrea.ascher@besi.com</a> Besic Austria GmbH Innstrasse 16, 6241 Radfeld, Austria
HR Besic APac Sdn. Bhd.	Name: Mint Lee Position: HR Manager Email: <a href="mailto:mint.lee@besi.com">mint.lee@besi.com</a> Besic APac Sdn. Bhd. No. 3, Jalan 26/7, Seksyen 26, 40400 Shah Alam, Selangor, Malaysia
HR Besic Leshan Co., Ltd	Name: Sophia Xu Position: HR Manager Email: <a href="mailto:sophia.xu@besi.com">sophia.xu@besi.com</a> Besic Leshan Co., Ltd. No. 8, Ying Bin Road High Tech Zone, Leshan, Sichuan, China 614012
HR Besic Singapore Pte. Ltd. and Sales and Service entities	Name: Paul Sam Position: HR Manager Singapore, Shanghai, Korea, Taiwan, Philippines, Thailand & Hong Kong, India Email: <a href="mailto:paul.sam@besi.com">paul.sam@besi.com</a> Besic Singapore Pte. Ltd. 1 Science Park Road Singapore Science Park 2, Capricorn Building #03-11 Singapore 117528



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HR Besi Netherlands B.V. and Mecco Equipment Engineers B.V.	Name: Paul Brantz Position: HR Manager ( <i>a.i.</i> ) Email: <a href="mailto:paul.brantz@besi.com">paul.brantz@besi.com</a> Besi Netherlands B.V. Ratio 6, 6921 RW Duiven, the Netherlands
Secretary BE Semiconductor Industries N.V.	Name: Claudia Vissers Position: Executive Secretary Email: <a href="mailto:claudia.vissers@besi.com">claudia.vissers@besi.com</a> BE Semiconductor Industries N.V. Ratio 6, 6921 RW Duiven, the Netherlands