Intevac Human Rights Statement of Principles

At Intevac, we strive to make positive contributions not only to our served industries, but to our local communities and the world around us. We value and respect our employees, customers and suppliers, and carefully consider the impact our decisions may have on our communities and the environment. As a company, we are committed support a better future for everyone.

Our Commitment to Human Rights

Intevac is committed to protecting human rights and conducting business in an ethical and responsible manner. Intevac's Human Rights Statement of Principles memorializes our commitment to respect human rights, and reflects the laws of the countries in which we operate.

Our commitment to human rights is detailed in various company policies and statements, including our companywide Code of Business Conduct and Ethics, our Director Code of Ethics, our Conflict Minerals Policy, and our Corporate Sustainability Statement. These policies and statements formalize our policies for training and accountability encompassing our global workforce, along with the enforcement mechanisms for any non-compliance. We also respect international human rights principles promoting and protecting human rights, including the United Nations Guiding Principles on Business and Human Rights.

Our Workforce

We require all newly hired employees to complete our "Standards of Business Conduct" training curriculum, and to be certified within their first month of employment. This training and certification is renewed every two years. Our "Standards of Business Conduct" curriculum clearly displays Intevac's commitment to equal opportunity employment and includes our policies against discrimination, harassment and retaliation.

Our Supply Chain

We hold our direct suppliers to the same standards that we hold ourselves too, regarding Environmental, Social & Governance (ESG) initiatives. To this end, we require suppliers to Submit Conflict Minerals Reporting Templates as part of our Conflict Minerals due diligence.

Our Principles

- 1. **Culture of Inclusion:** At Intevac we value exceptional talent and diverse perspectives, knowing our differences can be a great strength. We believe that culture and workplace experiences are important to attracting and retaining the best people. Ensuring respect for diverse backgrounds and perspectives, is incorporated into our company's culture at every level.
- 2. **No Discrimination, No Harassment:** Intevac is committed to providing a workplace that is free of discrimination, harassment and retaliation. We do not tolerate any discrimination or harassment rooted in race, color, national origin, ancestry, religion, age, sex, pregnancy, childbirth or related medical

conditions, sexual orientation, gender identity, marital status, physical disability, mental disability, medical condition, genetic information, family care leave status, veteran status, or any other basis prohibited by law. This applies to all workforce- related decisions and actions, including, but not limited to, recruitment, hiring, training, compensation, benefits, promotion and social and recreational programs.

3. **Prevention of Human Trafficking, Child Labor and Forced Labor**: We strictly prohibit the use of child or forced labor, including modern forms of slavery and human trafficking in all of our global operations and facilities. All work is voluntary. Employees are able to leave work at any time and to terminate their employment. We do not confiscate employee identification documents, such as passports, work permits, etc. Employees are not required to pay any fees related to their employment.

We also prohibit any form of child or forced labor in our supply chain. Intevac suppliers are required to comply with all applicable laws and regulations regarding child and forced labor and slavery and human trafficking.

- 4. **Workplace Safety:** Intevac places the highest priority on the safety of our workforce, suppliers, and customers. We are committed to complying with or exceeding all regulatory requirements relevant and applicable to the health and safety performance of our operations, processes and products and to protecting, maintaining and promoting the safety, health and general well-being of our workforce. We carry out this responsibility by ensuring that effective safety training is provided and protective measures are in place. Please read our <u>Corporate Sustainability Statement</u> for more information on Workplace Safety.
- 5. Working Hours and Wages: We believe in providing fair and equitable wages and adhere to all applicable wage, work hours, overtime and benefits laws. We pay workers in compliance with applicable wage laws, including those related to minimum wage and legally mandated benefits, and do not permit deductions from wages as a disciplinary measure. Workers are provided with timely and clear wage statements, with sufficient information to verify accurate compensation for work performed. We are committed to complying with applicable laws regarding the use of contingent workers.
- 6. **Freedom of Association**: Intevac acknowledges freedom of association and does not discriminate against employees based on their engagement in any lawful association.
- 7. **Anti-Corruption**: We win business based on the merits and integrity of our products, services and people. We are committed to conducting business in accordance with the highest standards of business integrity and in compliance with the law everywhere we do business, including anti-corruption laws such as the United States Foreign Corrupt Practices Act (FCPA). We require that our business partners, including suppliers, share the same commitment and have appropriate policies and procedures in place to ensure compliance.
- 8. **Data Privacy and Safekeeping**: We secure and safeguard the personal information entrusted to us by our customers and workforce using lawful and fair data handling practices. As we do our part to make possible the technology shaping the future, we ensure data protection accountability throughout our workforce through transparent privacy policies and procedures. We are constantly evolving our data

governance measures to support our commitment to comply with global data privacy laws protecting our company, workforce, and business partners' information.

Reporting Concerns

Maintaining our reputation for integrity depends upon our employees and business partners working together to do the right thing. It is important that any potential violation of law or company policy be promptly raised to our attention so that it can be appropriately addressed. We have numerous channels available through which employees, contractors, suppliers and other business partners may report, either anonymously or by name, if they become aware of conduct inconsistent with our values or policies. Our management team is focused on fostering a culture of trust so that employees at every level feel comfortable speaking up about concerns. We maintain a confidential hotline through which our employees may express complaints or concerns regarding possible violations of, or non-compliance with, our <u>Code of Business Conduct and Ethics</u>, and other corporate policies, laws and regulations, as well as retaliatory acts against anyone who makes such a complaint or assists in the investigation of said complaint.

Accountability; Governance

In our dynamic business and regulatory environment, we are committed to transparency and continual improvement in our approach to human rights and the above-referenced policies and procedures. We receive regular input from our employees, customers, directors, stockholders and stakeholders, and periodically update these policies and procedures as needed. Potential violations of our <u>Code of Business Conduct and Ethics</u> are investigated in accordance with the company's standard procedures for potential business misconduct. Failure to cooperate may result in disciplinary action for our employees and business partners, up to and including termination. The Board's Audit Committee is responsible for overseeing overall program design and implementation, along with reviewing and investigating matters relating to the integrity of executive officers.