

Company Name ASML Holding
Industry ICT (Own operations and Supply Chain)
Overall Score (*) 20.0 out of 100

Theme Score	Out of	For Theme
2.7	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
3.0	20	D. Performance: Company Human Rights Practices
4.0	20	E. Performance: Responses to Serious Allegations
3.9	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy: 'The purpose of this policy is to express ASML's commitment to respecting Human Rights and honoring the values of Ethics as expressed in our Code of Conduct.' [Human Rights Policy, 07/2017: staticasml.com] Met: UNGC principles 1 & 2: According to its Code of Conduct and Business Principles document, the Company 'is committed to the United Nations ('UN') guiding principles on Business and Human Rights as well as the International Labor Organisation ('ILO') Declaration on Fundamental Principles and Rights at Work, the UN declaration of human rights, the UN global compact and the principles as laid down in the Organisation for Economic Co-operation and Development ('OECD') guidelines for Multinational Enterprises.' [Code of Conduct and Business Principles, 2016: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: See above [Code of Conduct and Business Principles, 2016: staticasml.com] Met: OECD: See above. [Code of Conduct and Business Principles, 2016: staticasml.com]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: ILO Core: The Company states in its Code of Conduct and Business Principles that it is 'committed to the United Nations ('UN') guiding principles on Business and Human Rights as well as the International Labor Organisation ('ILO') Declaration on

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Fundamental Principles and Rights at Work, [...].' [Code of Conduct and Business Principles, 2016: staticasml.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company indicates in its Corporate Responsibility Policy: 'We work with our partners in the supply chain to ensure that they meet or exceed requirements for corporate responsibility set out in the RBA (Responsible Business Alliance) Code of Conduct.' The RBA Code of Conduct includes provisions on ILO Core areas: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] Child labor is not to be used in any stage of manufacturing. [...] Participants should be committed to a workforce free of harassment and unlawful discrimination. [...] In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, as it has indicated to respect these rights 'in conformance with local laws', no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org & Corporate Responsibility Policy, 12/2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: Code of Conduct and Business Principles document includes provisions to different ILO core. The Company has commitments in relation to discrimination, child labour and forced labour. In relation to freedom of association and collective bargaining it states the following: 'We respect the rights of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly'. In addition, its Human Rights Policy includes provisions related to Non-discrimination, Child labor, freely chosen employment (prohibition to forced labor) and with respect freedom of association and collective bargaining the Company states: 'Freedom of association and the right to collective bargaining are self-evident, fundamental rights. As such, ASML is committed, in accordance with local laws, to respect the rights of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the rights of workers to refrain from such activities. Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, CHRB could not find alternative measures to support the rights of freedom of association and collective bargaining where they are restricted by law. [Code of Conduct and Business Principles, 2016: staticasml.com & Human Rights Policy, 07/2017: staticasml.com] • Met: Respect H&S of workers: The Company indicates in its Code of Conduct: 'We are committed to a safe and healthy working environment where mutual respect prevails.' [Code of Conduct and Business Principles, 2016: staticasml.com] • Met: H&S applies to ICT suppliers: The RBA Code of Conduct sets out health and safety standards for suppliers. This Code used OHSAS 18001 and ILO Guidelines on Occupational Safety and Health as reference to set the standards. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] • Not met: working hours for workers: The Company includes a provision related with 'Working hours' in its Human Rights Policy, which says: 'Workweeks are not to exceed the maximum set by local law. A workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Employees have the right to have at least one day off per seven-day period.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights Policy, 07/2017: staticasml.com] • Not met: Working hours for ICT suppliers: The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas: It its Conflict Minerals Statement, the Company indicates: 'ASML is committed to address concerns, in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>accordance with the US Dodd-Frank Wall Street Reform and Consumer Protection Act (§ 1502), that minerals extracted from the DRC and adjoining countries are funding military conflict and human rights violations in those regions. The four main minerals concerned are tin, tantalum, tungsten and gold, now commonly known as 'conflict minerals', or the '3TG'. However, its commitment Statement does not make reference to conflict and high-risk areas beyond DRC and adjoining. [Conflict Minerals Statement, 2017: staticasml.com]</p> <ul style="list-style-type: none"> • Not met: Based on OECD Guidance: No reference found to OECD Guidance in its Conflict Minerals Statement. [Conflict Minerals Statement, 2017: staticasml.com] • Not met: Requires responsible mineral sourcing from suppliers: The Company states that it 'encourages its suppliers and sub-suppliers to have in place policies and due diligence measures that will enable us to investigate if products and components supplied to us containing conflict minerals originate from the DRC and/or adjoining countries.' In addition, the RBA Code of Conduct requires: 'Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.' However, no reference found to OECD Guidance and all high risk areas. [Conflict Minerals Statement, 2017: staticasml.com & RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights: The company requires its suppliers to meet or exceed the RBA Code of Conduct which contains a commitment to migrant workers rights. However there is no evidence of this commitment in the company's own Code of Conduct. • Met: Expecting suppliers to respect these rights: The company indicates that it requires all its suppliers to meet or exceed the RBA Code of Conduct, the RBA code contains the following commitment to migrant workers rights "Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including...migrant...and any other type of worker." [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Met: Regular stakeholder engagement: In its 2018 Integrated Report the Company indicates: 'We communicate with our stakeholders through various channels and at a variety of levels.' It discloses a table with an overview of its main stakeholder groups, the way it communicates with them and an overview of the topics most relevant to them. For instance, the Company uses the following channels to communicate with its suppliers: 'ASML's supplier days; Supplier Relationship Satisfaction Survey; Direct interaction via supplier account teams / procurement account managers; and with local communities it uses the following channels: Neighbor Evening; Company visits; Meetings with various schools and local cultural institutions; ASML Speak up service, among others. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: In its Human Rights Policy, the Company states: 'Because ASML committed itself to uphold these Human Rights standards and guidelines we make sure that within our value chain the Human Rights are: [...]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Remediated: We secure that any (potential) human rights violations within ASML's value chain can be reported to ASML through a grievance mechanism (i.e. our Speak Up policy) and that such incidents are addressed with the appropriate level of priority.' However, the commitment to remedy is not clear, as it only seems to commit to "address" incidents reported through its grievance channel. [Human Rights Policy, 07/2017: staticasml.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: According to its Code of Conduct and Business Principles document: 'The ASML Board of Management is responsible for approving and issuing the Code and Business Principles [...]' [Code of Conduct and Business Principles, 2016: staticasml.com] • Met: Board level responsibility for HRs: See above. In addition, in its 2018 Integrated Report, the Company indicates: 'Ethics Board, chaired by our CEO, oversees and implements our Ethics Program. [...] The program consists not only of providing computer-based training on ethics, but also enrolls global classroom trainings throughout the company.' It also states that the Board of Management decides about 'Corporate responsibility issues that are relevant to ASML' with the approval of the Supervisory Board. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The Company indicates in its 2018 Integrated Report: 'All members of the BoM [Board of Management] are eligible to receive performance-related shares. [...] [There are] Three types of performance measures relate to the LTI: [...] Long-term strategic qualitative targets to ensure ASML's ability to keep performing at high standards.' The Long-Term strategic qualitative targets are related to: Technology Leadership Index and Sustainability. However, CHRB could not find further information describing which factors are included in the Sustainability target in order to evaluate whether human rights aspects are taken into account. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Not met: Senior responsibility for HR: The Company indicates: 'We rely on the integrity and accountability of our senior management to comply with relevant laws, and our Chief Compliance Officer supports the business in implementing measures to help managers fulfil their responsibilities. Our Compliance Office, led by our Chief Compliance Officer, oversees and advises management in complying with laws, regulations and corporate policies. While compliance is strongly rooted in a legal framework, there are three distinct compliance pillars spread throughout the organization: the Compliance Office within our legal department that provides an oversight and advisory role across the company; compliance owners, who are responsible for ensuring that adequate measures are in place to be compliant, and the internal control and compliance function, which supports compliance owners with the design and implementation of adequate internal controls to become, and remain, compliant.' However, it is not clear whether Chief Compliance Officer has also has the overall responsibility for human rights. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights: The Company indicates that it has 'a performance related bonus plan for our senior management. Under this plan, the bonus amounts depend on actual performance against corporate and personal targets.' However, CHRB could not find further information about the aspects included in the targets evaluated for the performance related bonus plan. [Annual Report 2016 (20F), 02/2017: staticasml.com] Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: HR risks is integrated as part of enterprise risk system: In its 2018 Integrated Report, the Company lists its risks factors, which includes: 'There are a number of risks inherent in doing business globally, for example: [...] Failure to comply with regulatory requirements, including anti-corruption, anti-bribery and human rights standards;' [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Audit Cttee or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Met: Communicates its policy to all workers in own operations: In its 2018 Integrated Report, the Company describes its Ethics Program, which applies to the whole Company: 'The program consists not only of providing computer-based training on ethics, but also enrolls global classroom trainings throughout the company. In addition, the Ethics Office uses other means of communication to reach out to employees, such as the Yearly Ethics Awareness Week. The Ethics Office also actively promotes our company's Speak Up policy and encourages employees to report any concerns relating to misconduct or suspected misconduct.' It also describes specific actions put in place in a new subsidiary (Hermes Microvision - HMI): 'In March, we released our Ethics Program to all HMI employees. This phased implementation entailed the onboarding of HMI managers into ASML's Ethics Program. They received our code of conduct, online as well as face-to-face training, and a dedicated website outlining relevant changes.' Moreover, the Company makes a reference to its 'online training programs (e.g. ethics/Code of Conduct)' as part of the channels used to communicate with its employees. The Code of Conduct includes human rights commitments. Ethics/code of conduct includes human rights. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 Met: Requiring ICT suppliers to communicate policy down the chain: The Company indicates in its 2018 Integrated Report the following: 'Compliance with the Responsible Business Alliance Code of Conduct is a prerequisite for doing

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to business relationships		<p>business with us, and we actively pursue our suppliers' adherence to this code. The requirement to meet human rights and other ethical RBA standards is included in our long-term product-related supplier contracts, along with the right to audit RBA compliance.' The RBA Code of Conduct requires: 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above [Integrated Report 2018: staticasml.com] • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: In its 2018 Integrated Report, the Company describes its Ethics Program, which applies to the whole Company: 'The program consists not only of providing computer-based training on ethics, but also enrolls global classroom trainings throughout the company. In addition, the Ethics Office uses other means of communication to reach out to employees, such as the Yearly Ethics Awareness Week. The Ethics Office also actively promotes our company's Speak Up policy and encourages employees to report any concerns relating to misconduct or suspected misconduct.' In addition, the Company describes specific actions put in place in a new subsidiary (Hermes Microvision - HMI): 'In March, we released our Ethics Program to all HMI employees. This phased implementation entailed the onboarding of HMI managers into ASML's Ethics Program. They received our code of conduct, online as well as face-to-face training, and a dedicated website outlining relevant changes.' • Not met: Trains relevant ICT managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company states in its Integrated Report 2018: 'Our Compliance Office, led by our Chief Compliance Officer, oversees and advises management in complying with laws, regulations and corporate policies. While compliance is strongly rooted in a legal framework, there are three distinct compliance pillars spread throughout the organization: the Compliance Office within our legal department that provides an oversight and advisory role across the company; compliance owners, who are responsible for ensuring that adequate measures are in place to be compliant, and the internal control and compliance function, which supports compliance owners with the design and implementation of adequate internal controls to become, and remain, compliant.[...] We had two broad, company-wide compliance focus areas in 2018: Working to take a pre-emptive approach to compliance, as opposed to responding in a reactive manner; Strengthening the local capability and responsiveness in the countries we operate in. We are in the process of decentralizing certain responsibilities in compliance and creating capabilities in the regions themselves. This improves traction and allows for training and awareness and compliance enhancements to be more tailored and relevant.' It is not clear, however, whether this process includes monitoring human rights/labour standards. [Integrated Report 2018: staticasml.com] • Met: Monitoring ICT suppliers: The Company indicates in its 2018 Integrated Report the following: 'We conduct supplier audits to address risks identified in our regular risk assessments. These audits also help ensure suppliers deliver what we expect. Our objective is to conduct a review of the sustainability efforts of our business-critical suppliers. To further align our efforts with international RBA guidelines we have replaced ASML's own sustainability survey with the RBA self-assessment survey as offered by the RBA platform. [...] We aim to audit our suppliers' sustainability performance according to a perceived level of risk.' [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Describes corrective action process: In addition, the Company indicates: 'If a supplier does not conform to the required standards, it is our policy to discuss mitigating measures.' However, CHRB could not find further information describing its corrective action process or the number of incidents found. [Integrated Report 2018: staticasml.com] • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored: The Company discloses the number of supplier audits conducted in its 2018 Integrated Report, however it is not clear the proportion of its supply chain that this number represents. [Integrated Report 2018: staticasml.com]
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects ICT selection of suppliers: The Company indicates in its 2018 Integrated Report the following: 'Compliance with the Responsible Business Alliance Code of Conduct is a prerequisite for doing business with us, and we actively pursue our suppliers' adherence to this code. The requirement to meet human rights and other ethical RBA standards is included in our long-term product-related supplier contracts, along with the right to audit RBA compliance.' [Integrated Report 2018: staticasml.com] • Not met: HR affects on-going ICT supplier relationships: In addition, the Company indicates: 'If a supplier does not conform to the required standards, it is our policy to discuss mitigating measures.' However, it is not clear how human rights performance affects its decisions to renew, expand or terminate business relationships. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance: In its Corporate Responsibility Policy, the Company states that it works with its 'partners in the supply chain to ensure that they meet or exceed requirements for corporate responsibility set out in the RBA (Responsible Business Alliance) Code of Conduct.' However, CHRB could not find further information or an example of how it works with its suppliers. [Corporate Responsibility Policy, 12/2018: staticasml.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement: The Company discloses information about its Stakeholder Engagement activities in its 2018 Integrated Report. It presents a table with an overview of its main stakeholder groups, the way it communicates with them and an overview of the topics most relevant to them. The stakeholder groups are the following: Customers, Shareholders, Employees, Suppliers and Society which includes Local Communities. However, CHRB could not find further information about the frequency or triggers of the engagement activities. [Integrated Report 2018: staticasml.com] • Not met: Workers in ICT SC engaged: See above. Although the Company indicates that it engages with its suppliers, it is not clear that it engages with its suppliers' workers. The channels it reports to engage with its suppliers are the following: 'ASML's supplier days; Supplier Relationship Satisfaction Survey; Direct interaction via supplier account teams / procurement account managers; Supplier audits; ASML Speak up service' [Integrated Report 2018: staticasml.com] • Not met: Communities in the ICT SC engaged: See above. Although the Company indicates that it engages with its suppliers, it is not clear that it engages with local communities from its supply chain. The channels it reports to engage with local communities are the following: 'Neighbor Evening; Brainport; HighTechXL; Make Next Platform ; Jet-Net; Dutch technology week; Company visits; Meetings with various schools and local cultural institutions (e.g. in the Netherlands and U.S.); ASML Speak up service' [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: See above. The Company presents an overview of the topics more relevant for each one of the stakeholder groups, however there is no further information about the views given by the stakeholders about those issues or about how the Company took those views into account. [Integrated Report 2018: staticasml.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Not met: Identifying risks in own operations• Not met: Identifying risks in ICT suppliers Score 2 <ul style="list-style-type: none">• Not met: Ongoing global risk identification• Not met: In consultation with stakeholders• Not met: In consultation with HR experts• Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Not met: Salient risk assessment (and context): In its website section 'Human Rights', the Company indicates: 'We frequently assess actual and potential human rights risks in our own operations and in our supply chain.' However, CHRB could not find further information about the processes for assessing its human rights risks and impacts. [Human Rights, 04/2018: asml.com]• Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none">• Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Not met: Action Plans to mitigate risks• Not met: Including in ICT supply chain• Not met: Example of Actions decided Score 2 <ul style="list-style-type: none">• Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Not met: System to check if Actions are effective• Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none">• Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Not met: Comms plan re identifying risks• Not met: Comms plan re assessing risks• Not met: Comms plan re action plans for risks• Not met: Comms plan re reviewing action plans• Not met: Including ICT suppliers Score 2 <ul style="list-style-type: none">• Not met: Responding to affected stakeholders concerns• Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none">• Met: Channel accessible to all workers: The Company states: 'We encourage our employees to speak up and feel free to raise ethical issues without the fear of retaliation. ASML has a Speak Up policy in place for reporting issues relating to a (possible) breach of the Code of Conduct, including complaints of a financial nature (whistleblower's policy). For those employees who feel more comfortable speaking up anonymously, there is an external Speak Up system available (phone and webmail).' [Annual Report 2016 (20F), 02/2017: staticasml.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: In its 2018 Integrated Report, the Company discloses the number of grievances received in 2017 and 2018, 44 and 68 respectively. It also gives some figures about its Speak Up channel: 'In 2018, we registered 266 Speak Up messages made by employees. The highest number of these Speak Up messages were related to our business principle 'We respect people and planet', more specifically these concerned issues such as bullying, harassment, problems with style and language of communication and HR related topics (appraisal, demotion, compensation and benefits). Other queries related to our business principle 'We operate with integrity', mostly in the form of questions (am I allowed to accept or give away), but we also received Speak Up messages relating to employees (potentially) crossing the line of what is acceptable, as well as potential conflicts of interest. We have looked into and addressed all Speak Up messages.' However, there is no further information about the number of grievances filed, addressed or resolved related specifically to human rights (child labor, forced labor, freedom of association, etc). [Integrated Report 2018: staticasml.com] Met: Channel is available in all appropriate languages: According to its Speak Up Policy its Speak Up Service 'gives you the opportunity to raise concerns confidentially, and if necessary anonymously, and in your own language. The Speak Up Service is run by an independent service provider and is available 24/7. The Corporate Ethics Office receives a (translated) transcript and will be able to further confidentially communicate with you via this Speak Up Service channel.' [Speak up Policy, 10/2016: staticasml.com] Met: Expect ICT supplier to have equivalent grievance systems: The RBA Code of Conduct requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Met: Opens own system to ICT supplier workers: In its Speak Up Policy, the Company indicates: 'This Policy is applicable to all employees and everyone who carries out work for or on behalf of ASML worldwide (including trainees and contractors). It is also available to any person or party with whom ASML has or has had an involvement or business relationship (such as former employees, business partners, suppliers, shareholders, agents, distributors, representatives, customers and the community in general) and wishes to raise a concern about possible misconduct within ASML.' [Speak up Policy, 10/2016: staticasml.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: In its Speak Up Policy, the Company indicates: 'This Policy is applicable to all employees and everyone who carries out work for or on behalf of ASML worldwide (including trainees and contractors). It is also available to any person or party with whom ASML has or has had an involvement or business relationship (such as former employees, business partners, suppliers, shareholders, agents, distributors, representatives, customers and the community in general) and wishes to raise a concern about possible misconduct within ASML.' [Speak up Policy, 10/2016: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Describes accessibility and local languages: According to its Speak Up Policy its Speak Up Service 'gives you the opportunity to raise concerns confidentially, and if necessary anonymously, and in your own language. The Speak Up Service is run by an independent service provider and is available 24/7. The Corporate Ethics Office receives a (translated) transcript and will be able to further confidentially communicate with you via this Speak Up Service channel.' [Speak up Policy, 10/2016: staticasml.com] Not met: Expects ICT supplier to have community grievance systems Met: ICT supplier communities use global system: See above. [Speak up Policy, 10/2016: staticasml.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: ICT suppliers consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Response timescales: According to its Speak Up Policy: ' [...] you will receive a confirmation of receipt within five working days. Your Ethics Complaint will undergo an initial review to determine if it qualifies as an Ethics Complaint and if all the necessary (initial) information in order to initiate an investigation is available. Ultimately two weeks after confirmation of receipt we will inform you on the admissibility of the complaint. [...] If your concern qualifies as an Ethics Complaint [...] closure of the matter can be expected within two months after admissibility of the Ethics Complaint.' [Speak up Policy, 10/2016: staticasml.com] <p>• Not met: How complainants will be informed: In addition, the Company indicates: 'You will be informed on the status of your Ethics Complaint and of the overall findings, i.e. whether or not the Ethics Complaints Committee has established that misconduct or unethical behavior has taken place'. However, CHRB could not find further information explaining how exactly complainants will be informed. [Speak up Policy, 10/2016: staticasml.com]</p> <p>• Met: Who is handling the complaint [Speak up Policy, 10/2016: staticasml.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: Escalation to senior/independent level: It adds: 'In case an Ethics Complaint can potentially seriously harm (the reputation of) ASML the final decision will be taken directly by the Ethics Board.' [Speak up Policy, 10/2016: staticasml.com]
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public statement prohibiting retaliation: In its Speak Up Policy, the Company states: 'It should also be emphasized that you will not be retaliated against for raising concerns in good faith about suspected misconduct. [...] Speaking Up is encouraged and any person Speaking Up is protected. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation for speaking up will not be tolerated.' [Speak up Policy, 10/2016: staticasml.com] <p>• Met: Practical measures to prevent retaliation: The Company indicates the following: 'Any form of threat or retaliation for speaking up will not be tolerated. Please directly contact the Corporate Ethics Office if you feel that your report may or has led to any negative personal consequences. This allows us to investigate this and take appropriate measures if necessary. [...] All concerns of potential misconduct and Ethics Complaints are treated confidentially. This means that your information will only be shared with your consent and with a limited number of people on a strict need-to-know basis, under full confidentiality and based on a proper mandate by the Ethics Complaints Committee. Information will only be disclosed outside this group if we are required to do so by law or an important public interest is at stake.' [Speak up Policy, 10/2016: staticasml.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects ICT suppliers to prohibit retaliation: The RBA Code of Conducts indicates: 'Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.' However, the grievance channel required does not include external stakeholders. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Living wage target timeframe: Its Human Rights Policy includes a section about 'Minimum Wage Standard & Living Wage (Fair Remuneration)' which says: 'Employee wages should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' In addition, in the RBA Code of Conduct, which the Company has adopted as a member of the Responsible Business Alliance (website 'Responsible supply chain'), it is stated: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no evidence found of the Company indicating that it pays living wages or has a timeframe for paying all workers a living wage which covers not only basic needs of employee and its family but also provides some discretionary income. [Human Rights Policy, 07/2017: staticasml.com & RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: Describes how living wage determined: In its Integrated Report 2018, the Company states: 'we are confident that we meet adequate 'living wage' requirements, meaning that employees earn salaries that meet their basic needs.' However, there is no mention to discretionary income or family needs. [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Achieved payment of living wage: The Company states in its website 'Corporate citizenship': 'We strive for fair and balanced remuneration, giving our employees the peace of mind to stay motivated and engaged in their day-to-day work. We ensure our remuneration policies are globally consistent, while respecting common practices in local markets. We continuously compare our remuneration to market benchmarks for technology professionals in every region where we operate. We are confident that we meet the adequate "living wage" requirement in each of these regions.' However, CHRB could not find evidence in public domain documents to support this statement. [Corporate citizenship, 08/2019: asml.com] Not met: Regularly review definition of living wage with unions
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Living wage in supplier code or contracts: In the RBA Code of Conduct, which the Company has adopted as a member of the Responsible Business Alliance and cascaded to its suppliers, it is stated: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no evidence found of the Company indicating that it pays living wages which covers not only basic needs of employee and its family but also provides some discretionary income. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org & Responsible supply chain, 08/2019: asml.com] Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Identifies suppliers back to product source <p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses significant parts of supply chain and why

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Does not use child labour: The Company states in its Human Rights Policy: 'ASML will not use child labor and will always adhere to the legal age requirements in all countries in which we operate. ASML does not employ children under the age of 15 or under the age of completing compulsory education. ASML will ensure proper management of student workers through proper maintenance of student records, due diligence of educational partners and protection of students' rights in accordance with applicable law and regulations.' In addition, in the RBA Code of Conduct, which the Company has adopted as a member of the Responsible Business Alliance (website 'Responsible supply chain'), it is stated: 'Child labor is not to be used in any stage of manufacturing.' [Human Rights Policy, 07/2017: staticasml.com & RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: Age verification of job applicants and workers <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remediation if children identified
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing.' However, there is no requirement to verify the age of job applicants and workers and to implement remediation programmes. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: How working with suppliers on child labour: In its website section 'Responsible Supply chain', the Company indicates: 'We encourage our suppliers to develop their own sustainability strategies, policies, and processes; set goals and report on their performance; engage with and audit their own suppliers; and develop, manage, and regularly test business continuity plans.' However, CHRB could not find further information how the Company works with suppliers specifically to eliminate child labour and to improve working conditions for young workers. [Responsible supply chain, 08/2019: asml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Pays workers in full and on time Met: Payslips show any legitimate deductions: In its Human Rights Policy, the Company indicates: 'For each pay period, employees shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' A similar provision is included in the RBA Code of Conduct, which the Company has adopted as a member of the Responsible Business Alliance (website 'Responsible supply chain'). [Human Rights Policy, 07/2017: staticasml.com & RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Does not retain documents or restrict movement: The Company indicates in its Human Rights Policy that it 'does not allow for any form of slave, forced, bonded, indentured, or involuntary prison labor, debt bondage or any form of forced child labor. [...] Employees are free to leave work at any time or terminate their employment.' [Human Rights Policy, 07/2017: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.[...] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Its Code of Conduct includes a provision to respect the right of freedom of association and collective bargaining: 'We respect the rights of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly'. In addition, its Code indicates: 'Any breach of the Code is taken seriously as ASML or individual employees could potentially be exposed to fines, penalties and criminal liability. Depending on the circumstances of a particular breach, the response from ASML could include (where permitted by law) and in line with our internal global corrective actions (sanctions) policy and local procedures: re-training, demotion, dismissal, evaluation or other employment consequences, including disciplinary actions up to and including termination of employment.' [Code of Conduct and Business Principles, 2016: staticasml.com] Met: Discloses % covered by collective bargaining: The Company discloses the proportion of its workforce which is covered by a collective bargaining agreement in its 2018 Integrated Report: 48% (2018). [Integrated Report 2018: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both requirement under score 1 met: See above
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: How working with suppliers on FoA and CB: The Company provided some information to CHRB in relation with this indicator, but it was not material. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Injury Rate disclosures: The Company discloses figures about Employee Safety in its 2018 Integrated Report: Recordable incident rate 0,24 (The number of work-related injuries and illnesses, per 100 full-time workers); Number of incidents resulting in personal injury / illness = 295; the Lost workday rate = 0,10 ; and the Severity rate = 6,24. [Integrated Report 2018: staticasml.com] Met: Lost days or near miss disclosure: See above. [Integrated Report 2018: staticasml.com] Met: Fatalities disclosures: The Company reports that 'No work-related fatalities were recorded in 2018, just as in previous years.' [Integrated Report 2018: staticasml.com] Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> Met: Set targets for H&S performance: According to its 2018 Integrated Report, the Company has set a health and safety target to 'Reduce recordable incident rate by 15% compared to average of previous three years (which results in a target for 2018 of 0.31)' [Integrated Report 2018: staticasml.com] Met: Met targets or explains why not: 'Our 'recordable incident rate' in 2018 was 0.24, an improvement on our target of 0.31. No work-related fatalities were recorded in 2018, just as in previous years.' [Integrated Report 2018: staticasml.com]
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Sets out clear Health and Safety requirements: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: Injury rate disclosures Not met: Lost days or near miss disclosures Not met: Fatalities disclosures Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on H&S: In its website section 'Responsible Supply chain', the Company indicates: 'We encourage our suppliers to develop their own sustainability strategies, policies, and processes; set goals and report on their performance; engage with and audit their own suppliers; and develop, manage, and regularly test business continuity plans.' However, CHRB could not find further information how the Company works with suppliers specifically to improve their practices in relation to health and safety. [Responsible supply chain, 08/2019: asml.com] Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Process to stop harassment and violence: The Company states in its Code of Conduct that it shows 'zero tolerance to any form of discrimination or harassment.' However, CHRB could not find further information describing its processes to prohibit harassment or discrimination against women. [Code of Conduct and Business Principles, 2016: staticasml.com] Not met: Working conditions take account of gender Not met: Equality of opportunity at all levels: The Company also states in its Code of Conduct that it provides 'working conditions based on objective and non-discriminatory criteria, which include a commitment to diversity and equal opportunities for all employees.' However, CHRB could not find further information describing how it provides equality of opportunity for women. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Meets all of the requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.' However, there is no reference to measures to ensure equal opportunities throughout all levels of employment. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on women's rights <p>Not met: Both requirement under score 1 met</p> <p>Not met: Provide analysis of trends in progress made</p>
D.4.9.a	Working hours (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Respects max hours, min breaks and rest periods in its own operations: The Company states in its Human Rights Policy that 'Workweeks are not to exceed the maximum set by local law. A workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Employees have the right to have at least one day off per seven-day period. ASML aims to increase the employability of its employees by amongst others focusing on flexibility: working practices that acknowledge and support employees to achieve a balance between their home and working lives in the different stages of their life'. The Company provided information additional evidence to CHRB in relation to bargaining respecting rights including engagement in dialogue with organizations representing its employees. However, no evidence found of references to international standards in relation to working hours, standard weekly hours. [Human Rights Policy, 07/2017: staticasml.com & RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> Met: How it implements and checks this: The Company indicates in its 2018 Integrated Report the following: 'We pay constant attention to protecting our employees from working overtime during peak periods. The nature of our business means employees often need to work significant amounts of overtime, taking responsibility for finishing projects on time. It is our policy to follow local rules regarding working hours. However, we apply our own company standards when these are stricter. Our company standards are based on Responsible Business Alliance norms. Due to high customer demand and job vacancies, there is still significant overtime. This applies particularly to Dutch employees who are temporarily working at an ASML or a client location abroad. As overtime remains an important attention point for management, we keep monitoring the use of overtime and take appropriate measures to manage the situation. We continue to raise awareness about our standards.' [Integrated Report 2018: staticasml.com]
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Working hours in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to international standards and national laws or standard weekly hours. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on working hours <p>Not met: Both requirements under score 1 met</p> <p>Not met: Provide analysis of trends in progress made</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Responsible mineral sourcing due diligence in supplier contracts: The RBA Code of Conduct requires: 'Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.' The RBA standards are part of the Company's commercial contracts with its suppliers, according to its Integrated Report 2018: 'The requirement to meet human rights and other ethical RBA standards is included in our long-term product-related supplier contracts, along with the right to audit RBA compliance.' However, there is no reference to OECD Guidance nor responsible sourcing mentions all relevant high-risk areas in the RBA Code of Conduct. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org & Integrated Report 2018: staticasml.com] Not met: Builds capacity with smelters/refiners <p>Score 2</p> <ul style="list-style-type: none"> Met: Disclosure of smelter information in supplier requirements: The RBA standards are part of the Company's commercial contracts with its suppliers, according to its Integrated Report 2018: 'The requirement to meet human rights and other ethical RBA standards is included in our long-term product-related supplier contracts, along with the right to audit RBA compliance. This code requires suppliers to 'Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request'. [RBA Code of Conduct (version 6.0), 2018: responsiblebusiness.org] Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Risk identification and disclosure in line with OECD Guidance Not met: Identification of smelters/refiners and OECD due diligence: In its 2017 Conflict Minerals Report, the Company indicates: 'The Company conducted a RCOI to ascertain if any 3TG minerals in its products originated in the Covered Countries. Our RCOI primarily consisted of conducting a supply chain survey using the reporting template provided by the Responsible Business Alliance and the Global e-Sustainability Initiative. We also utilized resources provided by the Conflict-Free Sourcing Initiative ("CFSI"), including the Conflict-Free Smelter Program ("CFSP"). The CFSP uses a third-party audit firm to identify smelters and refiners that have systems in place to assure sourcing of only conflict-free materials, which provides additional country of origin information. Due to the incomplete nature of the data available from our supply chain, which is a result of the 3TG supply chain complexity and the limited number of certified conflict free smelters for all Conflict Minerals, we are unable to determine the precise origin of the 3TG minerals which are included in our products. We plan to continue our efforts to trace the origins of the 3TG minerals within the supply chain as required by U.S. securities laws.' [Conflict Minerals Statement, 2017: staticasml.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses smelters/refiners judged in line with OECD due diligence Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Describes mineral risk management plan for supply chain: On its website 'Responsible supply chain', the Company indicates: 'We closely monitor the use of conflict minerals in our supply chain, originating from the Democratic Republic of the Congo or any neighboring countries. These include minerals mined under conditions of armed conflict and human rights abuses. The four main minerals concerned are tin, tantalum, tungsten and gold, also known as 3TG. We encourage our suppliers and sub-suppliers to have policies and due diligence measures in place to ensure the 3TG minerals we use are responsibly sourced.' However, CHRB could not find information about the steps taken to manage and respond to specific risks in mineral supply chain identified in its due diligence process according to the OECD Guidance. [Responsible supply chain, 08/2019: asml.com] Not met: Monitoring, tracking and whether better risk prevention/mitigation over time

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Supplier and stakeholders engaged in risk management strategy • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 16.04 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.01 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.85 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, ASML Holding made data public that met one or more elements of the methodology in 24 cases, leading to a disclosure score of 1.85 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI: The Company has a GRI Index document. [GRI Index: staticasml.com]
F.3	Key, High Quality Disclosures	0 out of 4	ASML Holding met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remediating adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of

the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.