

Brooks Automation is globally committed to respecting human rights. The Brooks Automation Human Rights Policy is based on our core values of Integrity, Accountability, and Employee Value and Customer Focus.

We commit to conduct our business in an ethical and responsible manner that respects human rights. We work to identify and do business with partners who aspire to conduct their business in a similar manner. This policy applies to every employee and agent of Brooks Automation.

This policy operates in conjunction with our current company policies such as Corporate EH&S, Respect in the Workplace, Supply Chain Social and Environmental Responsibility, Standards of Conduct, and Conflict Minerals Policy Statement.

This policy is uniquely our own. However, in its development, we considered for purposes of guidance, the framework of the United Nations Guiding Principles on Business and Human Rights, and the principles described in the Universal Declaration of Human Rights, and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

Diversity, Inclusion, and Non-discrimination

We welcome and value diversity, to ensure that our work benefits from a broad range of viewpoints and perspectives. Our growing global reach gives us the opportunity to bring to our business an even richer diversity of experiences and capabilities. We strive to maintain workplaces that are free from discrimination or harassment based on race, color, religion, gender, national origin or ancestry, age, disability, veteran status, military service, sexual orientation, genetic information, or gender identity, and any other protected category recognized under applicable laws. (See Appendix I below)

Employees

We adhere to our core values and [Standards of Conduct](#) with a commitment to treating our employees and all our partners with professionalism, dignity and respect. We pride ourselves at fostering an environment of innovation to challenge the status quo with novel thinking and collaborative work relationships. This includes respecting principles of freedom of association and the right to engage in collective bargaining in accordance with applicable laws.

Compensation Philosophy

Brooks Automation is committed to providing market competitive compensation programs to attract, retain and motivate a high performing workforce critical to the long-term success of the Company. As part of our compensation philosophy, we focus Brooks' workforce on the Company's financial goals to drive and motivate employee performance in key areas through the administration of a Variable Compensation Plan. Brooks also complies with applicable wage, work hours, overtime and benefits laws.

Privacy

Consistent with our Workplace Privacy Notice and Protection of Employee Personal Information policy, the Company complies with all local data protection regulations worldwide including, but not limited to European Union's General Data Protection Regulation ("GDPR"). Brooks strives to take all reasonable precautions to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, subject to applicable laws.

Safe and Healthy Workplace

Brooks Automation works to protecting the health and safety of employees and our customers and aims to conduct all business activities in an environmentally and socially responsible manner. We encourage and strive to have every employee actively champion those behaviors and the attitudes necessary to prevent work-related injuries, illnesses, property damage, and adverse impact to the environment.

Natural Resources

Brooks is committed to respecting the environment by striving to minimize the environmental impact of our operations and operating our businesses in ways that will foster a sustainable use of the world's natural resources.

Suppliers and Contractors

Recognizing that each entity in our network of suppliers and contractors should seek to undertake its own efforts to address human rights issues, we support their own efforts on this subject.

As set forth in our [Supply Chain Policy](#), we evaluate and select suppliers and contractors based on our core values contained in this policy and other applicable policies, including the Supply Chain Social and Environmental Responsibility policy.

Forced Labor, Human Trafficking and Child Labor

At Brooks Automation, we strive to eliminate forced labor, child labor, and human trafficking in the workplace.

Operationalizing These Commitments

As part of our commitment to respect human rights, we have undertaken to establish internal and external mechanisms to help identify, address and mitigate potential adverse human rights impacts that may be caused by our actions. Many of these mechanisms already exist and are integrated into our operations through established policies on a variety of topics such as conduct, ethics, sourcing, and safety, which include, but are not limited to the following:

- Standards of Conduct;
- Supply Chain Social and Environmental Responsibility policy;
- Conflict Minerals Policy Statement; and,

We strive to review the operationalization of this statement with a goal toward the continuous improvement of our ability to fulfill our commitments.

Our Human Resources and Legal Departments are responsible for coordinating the operationalization of our commitments in this Human Rights policy across the Company

Stakeholder Engagement

Consistent with our commitment to dialogue and engagement, we consult with relevant internal and external stakeholders to understand human rights-related concerns and issues, and to assess and escalate them as appropriate.

Reporting Issues Related to Our Commitment to Respect Human Rights

This Statement complements the Company's Corporate Ethics Hotline available here: (see Appendix II below) which sets forth the Company's clear policy on reporting illegal or unethical behavior, including adverse human rights impacts, and protection against retaliation for making such reports.

Appendix I

Diversity Statement

Our diversity makes us stronger and unites us as an organization.

We are committed to attracting, developing, and retaining diverse talent that is inclusive of every age, gender, gender identity, race, sexual orientation, physical capability, neurological difference, ethnicity, belief, and perspective.

Our goal is to develop cultural competency by seeking knowledge, increasing awareness, developing sensitivity, modeling respect, and promoting inclusion and unity.

As a global organization, this inclusive environment will propel our strength, success, and impact.

CORPORATE ETHICS HOTLINE

One of the elements built into Brooks Standards of Conduct is a secure method for reporting any situation in which an employee believes that there may be a violation of our Standards of Conduct.

In an effort to ensure that all of our employees worldwide feel comfortable that they have the right to report any questionable activities by anyone in the corporation we have established an anonymous Corporate Ethics Hotline to report any such violations. The Corporate Ethics Hotline is managed by an independent company named Global Compliance Services that now monitors and receives all calls. This is designed to ensure protection for anyone sending a report.

The telephone number for the reporting line is 888-311-6684 within the United States and Canada. Attached is a list of the telephone numbers in other countries where Brooks has locations. You can call at any time, night or day, from wherever you may be. In many cases, if you are not comfortable with English, the call can be referred to a person who speaks a language with which you are more comfortable.

If you would like to report any activity using email, the general Corporate Ethics Hotline for email is corporate.ethics@brooks.com.

Additionally, to communicate directly with the same confidentiality protections with the Audit Committee of our Board of Directors, you may call 978-262-7444 or email at audit.committee@brooks.com.

Additionally, you may communicate directly with any Audit Committee member of the Board of Directors at audit.committee@brooks.com.

In all cases your communications will be taken seriously, followed up and treated as entirely confidential.

If you would like to communicate any comments or concerns with this process, please contact Jason Joseph, our General Counsel, at jason.joseph@brooks.com or at 978-262-7655