

**ACM RESEARCH, INC.**  
**Stockholder Communications Policy**

The Board of Directors (the “*Board*”) of ACM Research, Inc. (“*ACM*”) has approved this Stockholder Communications Policy (this “*Policy*”) to provide for a process by which stockholders of ACM may communicate with the Board. This Policy has been approved by the Board on October 12, 2017 and shall take effect immediately upon the closing of ACM’s initial public offering.

*Stockholder Communications* The Board, or such committee of the Board or other person designated by the Board, shall further develop and implement the stockholder communication process as provided herein. Specifically, the stockholder communication process shall be implemented and maintained as follows.

Contact Information

A mailing address for stockholder communications shall be maintained to implement the stockholder communication process. All written stockholder communications to the Board, the independent or non-management directors of the Board, any committee of the Board, or to any individual director must be delivered in writing to the care of the Chair of the Board, or such other person as the Board may designate from time to time, at the following address:

ACM Research, Inc.  
42307 Osgood Road, Suite I  
Fremont, California 94539  
Attn: Chair of the Board  
Stockholder Communication

Communication Methods

Stockholders may communicate with the Board as a whole, with the independent or non-management directors, with a committee of the Board, or with a particular director by mail to ACM at the above address. The envelope must contain a clear notation indicating that the enclosed letter is a “Stockholder Communication.” All such letters must identify the author as a stockholder of ACM and clearly state whether the intended recipients are all members of the Board, all independent directors, all members of a committee of the Board, or any individual director.

Notwithstanding the foregoing, all stockholder proposals for inclusion in ACM’s proxy statement and related communications submitted pursuant to Rule 14a-8 of the Securities Exchange Act of 1934 must be submitted in accordance with Rule 14a-8.

Screening and  
Delivery Process

The Chair of the Board will act as agent for the directors in facilitating the receipt of stockholder communications. In such capacity, the Chair of the Board may review, sort and summarize the communications. The Chair of the Board, or such other person designated by the Board, shall review the communications received from stockholders at the above designated address on a regular basis and if they are relevant to ACM’s operations and policies, they shall be copied and forwarded to the appropriate director or directors as expeditiously as reasonably practicable. By way of example, communications that are unduly hostile, threatening, obscene, illegal or similarly inappropriate will not be forwarded to any director. Matters deemed to be trivial in the sole discretion of the Chair of the Board or such other person designated by

the Board will be delivered to the appropriate director or directors at the next regularly scheduled Board meeting. The Chair of the Board or such other person designated by the Board shall periodically provide the Board with a summary of all communications received that were not forwarded and shall make those communications available to any director upon request. The Board will determine whether any communications sent to the Board should be properly addressed by the entire Board or a committee thereof and whether a response to the communication is warranted.

*General*

Administration

This Policy shall be administered and interpreted by the Board and may be amended or repealed by the Board.

Dissemination

This Policy shall be distributed to each director upon adoption by the Board and to each subsequently elected director upon commencement of his or her directorship.

Annual Meeting Attendance

The Board hereby establishes as a policy that the directors are invited, but not required, to attend each annual meeting of stockholders of ACM, recognizing that it may not be possible or practicable, in light of other business commitments of the directors, to attend the annual meetings of stockholders of ACM.

Disclosure

This Policy shall be disclosed in ACM's proxy statements filed from time to time with the Securities and Exchange Commission in accordance with its applicable rules and regulations then in effect.