

Amkor Technology, Inc.

INSIDER TRADING POLICY

(As of November 6, 2019)

1. POLICY PURPOSE:

This Policy provides guidelines with respect to transactions in the securities of Amkor Technology, Inc. (the “Company”) and other companies and the handling of confidential information about the Company and companies with which the Company does business or competes. The Company’s Board of Directors has adopted this Policy to promote compliance with federal, state and foreign securities laws that prohibit certain persons who are aware of Material Nonpublic Information about a company from: (i) trading in securities of that company; or (ii) providing Material Nonpublic Information to other persons who may trade on the basis of that information. “Material Nonpublic Information” is defined in Section 4.e. below.

2. SCOPE:

a. Covered Transactions.

This Policy applies to all transactions in the Company’s securities (collectively referred to in this Policy as “Company Securities”), including common stock, options for common stock and any other securities the Company may issue from time to time, such as preferred stock, warrants, convertible debentures and other publicly-traded Company debt securities, as well as to derivative securities relating to the Company’s stock, whether or not issued by the Company, such as exchange-traded options.

b. Covered Persons.

The people and entities to which this Policy applies are sometimes referred to in this Policy as “Insiders” and include:

- i. all executive officers of the Company, all members of the Company’s Board of Directors, and all employees of, and consultants and contract workers for, the Company and its subsidiaries who receive or have access to Material Nonpublic Information regarding the Company;
- ii. all family members of a covered person who reside with the covered person (including a spouse, a child, a child away at college, stepchildren, grandchildren, parents, stepparents, grandparents, siblings and in-laws), anyone else who lives in the covered person’s household, and any family members who do not live in the covered person’s household but whose transactions in Company Securities are directed by the covered person or are subject to the covered person’s control, such as parents or children who consult with the covered person before they trade in Company Securities (collectively referred to as “Family Members”);

- iii. all entities controlled by a covered person; and
- iv. any person who receives Material Nonpublic Information from any covered person.

Any person who possesses Material Nonpublic Information regarding the Company is an Insider (and this Policy continues to apply to such person) for so long as the information is not publicly known or until it becomes no longer material, even after such person's termination of service to the Company. Any employee can be an Insider from time to time and would, at those times, be subject to this Policy.

3. STATEMENT OF POLICY:

a. General Policy

This policy prohibits the unauthorized disclosure of any Nonpublic Information acquired in the workplace and the misuse of Material Nonpublic Information in securities trading.

b. Specific Policies

- i. Trading on Material Nonpublic Information. No Insider may, directly, or indirectly through Family Members or any other person or entity, engage in any transaction in Company Securities, including but not limited to any purchase or sale or offer to purchase or offer to sell, during any period commencing with the date that he or she possesses Material Nonpublic Information regarding the Company, and ending at the beginning of the third Trading Day following the date of public disclosure of that information, or at such time as such Nonpublic Information is no longer material. As used herein, the term "Trading Day" shall mean a day on which national stock exchanges and the Nasdaq Stock Exchange ("Nasdaq") are open for trading. A "Trading Day" begins at the time trading begins on such day.
- ii. Tipping. No Insider shall disclose ("tip") Material Nonpublic Information to any other person (including family members) where such information may be used by such person to his or her profit by trading in the securities of companies to which such information relates, nor shall such Insider or related person make recommendations or express opinions on the basis of Material Nonpublic Information as to trading in Company Securities.
- iii. Confidentiality of Nonpublic Information. Nonpublic Information regarding the Company is the property of the Company, and the unauthorized disclosure of such information is forbidden. In the event any executive officer, director or employee of the Company or other Insider receives any inquiry from outside the Company, such as a stock analyst or investor, for information (particularly financial results and/or projections) that may be Material Nonpublic Information, the inquiry should be referred to the Company's Chief Financial Officer, who is responsible for coordinating and overseeing the release of such information to the investing public, analysts and others in compliance with applicable laws and regulations.

c. Potential Criminal and Civil Liability and/or Disciplinary Action

- i. Liability for Insider Trading. Pursuant to federal and state securities laws, Insiders may be subject to significant financial penalties and jail time for engaging in transactions in Company Securities at a time when they have knowledge of Material Nonpublic Information regarding the Company.
- ii. Liability for Tipping. Insiders may also be liable for improper transactions by any person (commonly referred to as a “tippee”) to whom they have disclosed Material Nonpublic Information regarding the Company or to whom they have made recommendations or expressed opinions on the basis of such information as to trading in Company Securities. The Securities and Exchange Commission (the “SEC”) may impose large penalties even when the disclosing person did not profit from the trading. The SEC and the national stock exchanges, including Nasdaq, use sophisticated electronic surveillance techniques to uncover insider trading.
- iii. Possible Disciplinary Actions. Employees of the Company who violate this policy shall also be subject to disciplinary action by the Company, which may include termination of employment.

4. PROCEDURE:

a. Trading Period Guidelines and Requirements

i. Black-out Period.

The period beginning at the close of market on or about the sixteenth (16th) day of the third calendar month of each quarter and ending at the beginning of the third Trading Day following the date of public disclosure of the financial results for that quarter is a particularly sensitive period of time for transactions in Company Securities from the perspective of compliance with applicable securities laws. This sensitivity is due to the fact that, during this period, executive officers, directors and certain other employees often possess Material Nonpublic Information about the expected financial results for the quarter during that period. Accordingly, this period of time is referred to as a “Black-out” period. During such “Black-out” periods, the following persons may not conduct transactions in Company Securities: (1) directors and officers; (2) direct reports to the President and Chief Executive Officer; (3) any employees reporting to such direct reports; and (4) any other employees, consultants and contract workers designated by the Compliance Officer as Insiders under this policy.

ii. Trading Window.

To ensure compliance with this policy and applicable federal and state securities laws, the Company requires that all directors and executive officers of the Company, all other employees, and consultants and contract workers designated as Insiders refrain from conducting transactions involving the purchase or sale of Company Securities other than during the period commencing at the open of market on the third Trading Day following the date of public disclosure of the financial results for a particular fiscal quarter or year and continuing until the close of market on or about the sixteenth (16th) day of the third calendar month of the next quarter (the “Trading Window”).

From time to time, the Company may also prohibit directors and executive officers, all other employees, and consultants and contract workers from trading Company Securities because of material developments known to the Company and not yet disclosed to the public. In such event, directors and executive officers, all other employees, and consultants and contract workers may not engage in any transaction involving the purchase or sale of Company Securities and should not disclose to others the fact of such suspension of trading. The Company would re-open the Trading Window at the beginning of the third Trading Day following the date of public disclosure of the information, or at such time as the information is no longer material.

The prohibition against trading during the Black-out period encompasses the fulfillment of standing or limit orders¹ by any broker, and the brokers with whom any such limit order is placed must be so instructed at the time it is placed.

It should be noted that even during the Trading Window, any person possessing Material Nonpublic Information concerning the Company should not engage in any transactions in Company Securities until such information has been known publicly for at least two (2) full Trading Days, whether or not the Company has recommended a suspension of trading to that person. Trading in Company Securities during the Trading Window should not be considered a “safe harbor,” and all directors, executive officers and other persons should use good judgment at all times.

b. Pre-clearance of Trades

The Company has determined that all executive officers and directors of the Company should refrain from trading in Company Securities, even during the Trading Window, without first complying with the Company’s pre-clearance process. Each executive officer and director should contact the Company’s Compliance Officer prior to

¹ Limit orders (including stop losses) are orders to buy or sell securities at a specified price which, depending on market factors, may remain open and unexecuted for an indefinite period (i.e., you place an order to sell stock at \$30 and the stock is trading, at the time of the order, for \$27. The order will remain open until it is either cancelled or executed at \$30).

commencing any trade in Company Securities. Such notice shall be submitted to the Company's Compliance Officer at least two Trading Days prior to the proposed trade (e.g., if the proposed trade is to take place on a Monday, the pre-clearance notice must be received by the Company's Compliance Officer no later than 5:00 p.m. Arizona time on the previous Thursday, where the intervening Friday is also a Trading Day). The Compliance Officer is under no obligation to approve a transaction submitted for pre-clearance and may determine not to permit the transaction or may impose restriction on the proposed transaction (such as a different deadline for completing the transaction or notice requirements following completion of the transaction).

The Company may also find it necessary, from time to time, to require compliance with the pre-clearance process from certain employees, consultants and contract workers and other Insiders other than and in addition to executive officers and directors.

c. Individual Responsibility

Every Insider and other person covered by this Policy has the individual responsibility to comply with this Policy against insider trading and to ensure that his or her Family Members and controlled entities also comply with this Policy, including during Trading Windows. The guidelines set forth in this Policy are guidelines only, and appropriate judgment should be exercised in connection with any trade in Company Securities.

An Insider may, from time to time, have to forego a proposed transaction in Company Securities even if he or she planned to make the transaction before learning of the Material Nonpublic Information and even though the Insider believes he or she may suffer an economic loss or forego anticipated profit by waiting.

d. Applicability of Policy to Inside Information Regarding Other Companies

This Policy and the guidelines described herein also apply to Material Nonpublic Information relating to other companies, including the Company's customers, vendors or suppliers ("Business Partners"), when that information is obtained in the course of employment with, or other services performed on behalf, of the Company. Civil and criminal penalties, and termination of employment, may result from trading on inside information regarding the Company's Business Partners. All employees should treat Material Nonpublic Information about the Company's Business Partners with the same care required with respect to information related directly to the Company.

e. Definition of Material Nonpublic Information

Information that is material to a company and that has not been made available to the general public through a widely circulated news or wire service or through a public filing with the SEC is referred to as "Material Nonpublic Information."

Information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision (such as to buy, sell or hold) regarding securities.

While it may be difficult under this standard to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. While this list is not exhaustive, examples of such information may include:

- Financial results
- Known but unannounced future earnings or losses, or other earnings guidance or guidance changes
- Execution or termination of significant contracts with other companies including Business Partners
- Significant related party transactions
- News of a pending or proposed merger or other acquisition
- News of the disposition, construction or acquisition of significant assets
- Impending bankruptcy or financial liquidity problems or changes in debt ratings
- Significant changes in sources or availability of suppliers
- Significant patent or other intellectual property milestones or disputes
- Significant scientific achievements or other developments from research efforts
- Significant developments involving customers or other corporate relationships
- Changes in dividend policy
- New product announcements of a significant nature
- Significant product defects or modifications
- Significant pricing or cost changes
- Stock splits or stock repurchases
- New equity or debt offerings, or financing transactions outside the ordinary course
- Threatened or actual litigation or significant developments in litigation
- Significant changes in senior management
- Regulatory actions
- Significant cybersecurity or data breach events

Both positive and negative information can be material. Any questions concerning the materiality of information should be resolved in favor of materiality, and trading should be avoided.

f. Certain Prohibited Transactions

Insiders may not engage in speculative or hedging, monetization or other derivative transactions in Company Securities. Examples of these transactions include selling Company Securities you do not own or short sales, failing to deliver Company Securities you have sold, put or call options, swaps, spread bets, collars, forward sale contracts, holding Company Securities in a margin account or pledging Company

Securities as collateral for a loan. Such transactions may reduce the incentive to improve the Company's performance, focus attention on short-term performance at the expense of the Company's long-term objectives, limit exposure to the full risks and rewards of ownership of Company Securities or create the appearance of trading based on inside information or have an expectation that Company Securities will decline in value.

g. Certain Exceptions

The exercise of stock options under the Company's stock plans (but not the sale of any such shares issued upon such exercise or purchase, unless such sale is to the Company) is exempt from this Policy, since the other party to the transaction is the Company itself and the price does not vary with the market but is fixed by the terms of the option agreement or the plan. The vesting of restricted stock and the exercise of a tax withholding right pursuant to which the Company withholds shares of stock to satisfy tax withholding requirements upon the vesting of any restricted stock are also exempt (however, the sale of such restricted shares is not exempt). In addition, the Company considers that bona fide gifts of Company Securities or transactions in mutual funds that hold Company Securities are exempt from this Policy.

h. Additional Information – Directors, Executive Officers and Other Designated Section 16 Individuals

Directors, executive officers, and other individuals designated by the Company (collectively "Section 16 Individuals") must also comply with the reporting obligations and limitations on short-swing transactions set forth in Section 16 of the Securities Exchange Act of 1934, as amended. The practical effect of these provisions is that Section 16 Individuals who purchase and sell (or sell and purchase) Company Securities within a six month period must disgorge all profits to the Company whether or not they had knowledge of any Material Nonpublic Information. Under these provisions, neither the receipt of an option under the Company's option plans, nor the exercise of that option is deemed a purchase under Section 16; however, the sale of any such shares is a sale under Section 16. Section 16 prohibits Section 16 Individuals from ever making a short sale of the Company's stock. Transactions in put and call options for Company Securities may in some instances constitute a short sale or may otherwise result in liability for short swing profits. All Section 16 Individuals must confer with the Compliance Officer before effecting any such transaction.

The Company has provided, or will provide, separate memoranda and other appropriate materials to its executive officers and directors regarding compliance with Section 16 and its related rules.

i. 10b5-1 Trading Plans

In lieu of clearing each individual trade, officers, directors, and Insiders may elect to purchase or sell Company Securities (either in the open market, and/or by the exercise of stock options) pursuant to a written plan or set of instructions to his or her

stockbroker that meets certain conditions specified in Rule 10b5-1 under the Exchange Act (a “Trading Plan”). Trades made pursuant to Trading Plans need not occur in the Trading Window.

The Company reserves the right to bar all trades in Company Securities, even pursuant to existing Trading Plans, if the Company determines that such a bar is in the best interests of the Company.

All Trading Plans must be approved by the Company’s Compliance Officer.

Trading Plans will not be approved unless they contain the following provisions:

- i. The Trading Plan must be written and signed by the person seeking to adopt the Trading Plan. The Company will keep a copy of each Trading Plan in its files.
- ii. The person seeking to adopt the Trading Plan must state that as of the date of the adoption of the Trading Plan, he or she is not aware of any Material Nonpublic Information.
- iii. The Trading Plan must either specify or set a formula for the amount, pricing and timing of transactions in advance or delegate discretion on these matters to an independent third party. For example, the Trading Plan may instruct the stockbroker to sell a particular number of shares at market prices, in each upcoming month or quarter. Once the Trading Plan is adopted, the person must not exercise any influence over the amount of securities to be traded, the price at which they are to be traded or the date of the trade.
- iv. The person seeking to adopt the Trading Plan must acknowledge that he or she may not discuss with his or her stockbroker Material Nonpublic Information regarding the Company or the Company Securities. All communication between the person seeking to adopt the Trading Plan and his or her stockbroker or others involved with the Trading Plan shall be in writing.
- v. The person seeking to adopt the Trading Plan must declare that he or she has not entered into, and will not enter into, any corresponding or hedging transaction or position with respect to Company Securities.
- vi. The broker executing a trade under any Trading Plan must agree to promptly notify the stockholder and the Company of the transaction. Except for such notifications, unless required by SEC regulation or any other law to do so, the stockbroker shall not inform the stockholder during any given month of the status of its efforts to sell shares on behalf of the stockholder during that month.

The Company strongly recommends a person seeking to adopt a Trading Plan consult an attorney prior to the adoption of a Trading Plan.

j. Inquiries

Please direct your questions as to any of the matters discussed in this Policy to the Company's Compliance Officer. Unless otherwise designated by the Company, the Company's General Counsel shall serve as the Compliance Officer. All determinations and interpretations by the Compliance Officer shall be final and not subject to further review.