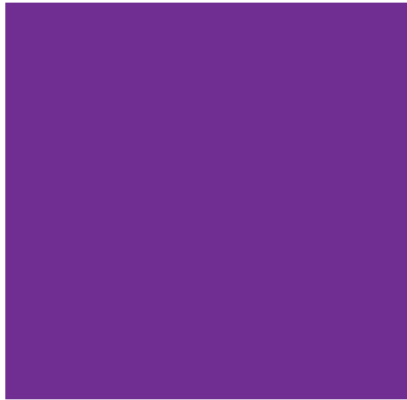


Tokyo Electron Group
Code of Ethics



Tokyo Electron Group
Code of Ethics

Introduction

Tokyo Electron's Corporate Philosophy is defined as "We strive to contribute to the development of a dream-inspiring society through our leading-edge technologies and reliable service and support."

The importance of semiconductors and flat panel displays that sustain the fast-growing data society via the Internet of Things, high-speed communication network and artificial intelligence has further increased.

At the same time, society's expectation of Tokyo Electron Group has become extremely high.

We acknowledge our social responsibilities and continue to strive to be a company that society highly values and employees can be proud of. To make this happen, it is critical that each and every employee, which is the source of the company's growth, adheres to high standards of ethics. Tokyo Electron's Code of Ethics clearly states what we should be conscious of and how we should act when encountering problems.

When revising the Code of Ethics this time, in addition to updating the contents, we have also made it user-friendly for Tokyo Electron Group employees around the world. We have high expectations that your understanding of the Code will enable you to act boldly and strategically with further speed.



A handwritten signature in black ink that reads "Toshiki Kawai". The signature is fluid and cursive.

Toshiki Kawai
Representative Director,
President & CEO
Tokyo Electron Limited

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My Code of Ethics



The Code of Ethics



The Code of Ethics stipulates the behavior expected of all employees of Tokyo Electron Group, to advance our basic philosophy and vision and comply with the laws and regulations of the countries or regions where we do business. By acting according to the Code of Ethics, we can continue to be a company that lives up to society's expectations as a truly global leader and a company that we can all be proud to be a part of.

Our Journey with Ethics and Compliance

About the Tokyo Electron Group Code of Ethics

"Tokyo Electron Group Code of Ethics" ("Code of Ethics" or "Code") is a code for Tokyo Electron Limited and its subsidiaries (collectively "TEL Group," the "Company," or "we"). The Code of Ethics is a guide which sets out common and minimum standards, and establishes the "appropriate actions to be taken" for our daily work to comply with the laws, rules and regulations in the countries in which TEL Group operates ("laws and regulations"), as well as internal Company policies and rules. The Code of Ethics supersedes any policies or rules that are not consistent with it; however, if there is a conflict between the contents of the Code of Ethics and local laws or regulations, the stricter shall apply.

TEL Board of Directors has the sole authority to issue, amend and revoke the Code of Ethics at any time.

Scope of the Code of Ethics

The Code of Ethics applies to all officers (including directors and company auditors), Corporate Officers and Executive Officers of TEL Group, persons who have entered into employment with and is rendering services to any entity in TEL Group (irrespective of employment status, such as regular employees, contract employees, advisers, fixed-term employees, employees rehired after mandatory retirement, part-time employees, and workers hired on a daily or seasonal basis), and other persons who perform work for the Company such as secondees and temporary workers from another entity or agency (collectively the "Officers and Employees"), and we encourage and expect our suppliers and third parties to follow the Code of Ethics or comply with their internal rules that are equivalent to the Code of Ethics.

Our Responsibility – "Read, Understand and Apply"

To embody TEL's Corporate Philosophy and Vision, it is critical that all Officers and Employees read, understand and apply the Code of Ethics in their day-to-day business. All Officers and Employees, are also expected to annually acknowledge that we have read, understood, and continuously comply with the Code of Ethics.

In other words, as a member of TEL Group striving for sustainable growth together,

We are:

- ▶ Committed to doing the right things,
- ▶ Aware of risks around us, and
- ▶ Knowledgeable on doing things right.

However, things are not always black and white. In case of doubt about a course of action or conduct, ask yourself the following questions.

- Would my action be in compliance with laws and regulations, Code of Ethics, and/or other internal policies?
- Wouldn't my action damage my and/or the Company's reputation?
- Would I explain with confidence my action to all the stakeholders?

If the answer to any of the above is not "yes" (for the second question, "no"), you should not continue with that action. Please consult with your direct supervisor or other channels available to you with on any questions that you may have in doing your day-to-day business.

Supervisor's Responsibilities

All supervisors of TEL Group are expected to raise compliance awareness among their team members and promote a culture of ethics and compliance. More specifically, supervisors are expected to:

- Ensure that their team members understand their responsibilities under the Code of Ethics and other policies through day-to-day discussion of ethical conduct.
- Never encourage or direct team members to achieve business results at the expense of ethical conduct or compliance, and stop violations.
- Create an environment where they feel comfortable raising concerns without fear of retaliation.

Raising Concerns/Speaking Up

Raising and discussing ethics and compliance concerns is a key for our success because we can address problems at the outset, before they become bigger issues. If something goes wrong and/or is not working as designed, please raise your concerns immediately. This is our responsibility.

There are multiple channels for raising your concerns:

- Your supervisor
- Department head
- Legal/Compliance Department
- HR Department
- Chief Compliance Officer

If you wish to report an ethics and compliance concern anonymously (and anonymity is permissible under your local law), please use the TEL Group Ethics & Compliance Hotline, a third-party reporting channel, which is available 24 hours a day, seven days a week, and in all languages spoken within TEL Group:

TEL Group Ethics & Compliance Hotline at:



URL : tel.ethicspoint.com

Role of TEL Group's Ethics & Compliance Function

TEL Group's Ethics & Compliance function has been established to prevent, detect and correct unethical or non-compliant behavior and to ensure that our business is always on the right legal and ethical course. TEL Group's Chief Compliance Officer, along with management team, is responsible for ensuring TEL Group's commitment to complying with all applicable laws and regulations, as well as the objectives laid out in this Code of Ethics.

Company's Response

The Company treats ethics and compliance concerns reported in good faith very seriously. The Company assigns an investigation team, conducts an investigation and, if the concern is substantiated, takes corrective actions including disciplinary action if necessary. The individual who raised the concern will receive feedback on the outcome.

The Company also expects all Officers and Employees of the Company to cooperate with investigations.

Confidentiality and Zero Tolerance of Retaliation

Confidentiality is required and should be respected for an effective investigation. Where possible, keeping investigations confidential is in the best interest of the Company and investigation participants such as the reporter, the subject of the investigation and witnesses.

Information will only be disclosed as required by legitimate needs of the investigation. The Company requests all the participants to maintain confidentiality, and this requirement also extends equally to investigators and management. Breach of confidentiality is grounds for disciplinary action.

The Company will not tolerate retaliation against those who report ethics and compliance concerns in good faith. No one is permitted to engage in retaliation, or any form of retaliatory behaviors, against another for reporting ethics and compliance concerns in good faith or cooperating with an investigation. If you feel you are being retaliated against, please immediately contact any of the channels available to you. Retaliation is grounds for disciplinary action.



1

Business Practices



Mutual trust is at the foundation of our work

We strive to continue the business growth of TEL Group, and this cannot be achieved without mutual trust. Each officer and employee must earn the trust of others, being committed to high ethical standards and fairness in all activities.

1-1 | Safety and Quality



We pursue safety in our business activities – development, manufacturing, transportation, installation and maintenance of our products – and provide the highest quality products and services that meet customer expectations.

- We achieve the above goals by meeting or exceeding all legal and regulatory requirements and through the rigorous application of our safety and quality management system and processes.
- We implement effective and preventive processes, and if appropriate, corrective actions to assure that our business activities are conducted safely, and that the highest quality products and services are delivered by the Company.



For the TEL Group Safety Policy, please refer to the following website at:

<https://www.tel.com/csr/safety/safety-management/>



For the TEL Group Quality Policy, please refer to the following website at:

<https://www.tel.com/csr/quality/quality-management/>

1-2 | Suppliers



We select suppliers based on objective criteria and review their qualifications by ensuring that they comply with laws and regulations as well as our business ethics.

- We select our suppliers based on objective criteria, such as quality, technology, price, delivery times, compliance and other reasonable standards.
- As a part of the global supply chain where we do our business, we consider the environmental, social and ethical impacts of the Company's supply chain that are critical in the industry.
- We require our suppliers to comply with laws and regulations, including in relation to anti-bribery and corruption, fair competition, forced labor, bonded labor, child labor or modern slavery, and to respect our business ethics. At the same time, we continue to work respectfully with our suppliers and continue to build strong partnerships with them.
- We do not accept raw materials or materials that contain conflict minerals which have been obtained illegally by use of child labor or modern slavery, or through other abuses of human rights.



For the TEL Group Procurement Policy and Procurement Policy – Supplement, please refer to the following website at: <https://www.tel.com/csr/procurement/procurement-management/>

1-3 | Export & Import



We are committed to upholding all applicable laws and regulations, and our Company's internal rules regarding the export and import of goods and technology.

- In any countries or regions where we do business, we comply with export/import (including re-export) laws and regulations, licensing requirements, embargoes and other restrictions that have been approved by recognized national and international authorities.
- When importing/exporting our products or technology, we follow the import/export requirements of the applicable government agencies of countries or regions and provide accurate, truthful and complete information about our products, technology and other items to customs and other relevant authorities.

- Many countries where we do business have laws in place which regulate the import/export of goods and technology. The United States has controls which restrict the export of certain products (e.g. services, technical data and software) to other countries, as well as the re-exporting of those items from a country other than U.S. to another non-U.S. destination.

- As for exporting, the classification and content of products or technology, final destination, and end user need to be confirmed in accordance with laws and regulations in many jurisdictions.
- Trade restrictions (e.g. sanctions, embargoes, and denied-parties lists) seek to prevent or limit trade with specific entities and, in some cases, entire countries. TEL Group is committed to screening the parties with whom we do business.

1-4 | Fair and Open Competition



We strive to operate in a fair, open and competitive marketplace.

- We are committed to complying with all competition laws in the markets where we do business and do not engage in illegal anti-competitive activities.
 - Competition laws and regulations in the markets where we do business, such as the U.S. and EU, have extraterritorial application.
 - Investigations by competition authorities may result in significant fines and costs, and incur damage to our reputation. Criminal sanctions may also apply, and the Company may be liable for civil damages.
 - The following are examples of conducts that are always illegal:
 - ▶ Competitors agreeing or taking concerted actions regarding:
 - prices or any price components, terms and conditions,
 - product or territory allocation or sharing,
 - boycotts, or
 - limits on production, sales, inventory or research and development.

- ▶ Employing unfair or deceptive trade practices or methods that generally fall within the scope of unfair competition laws, such as:
 - misleading advertising,
 - disparaging a competitor's product,
 - harassing a competitor, or
 - stealing trade secrets or other confidential business information.
- The following are examples of conducts that may be considered illegal and may result in high fines in many countries:
 - ▶ Dominant companies taking actions that appear to be efforts to control a market, such as:
 - tying or requiring bundling of separate products,
 - unfairly terminating dealers, distributors or suppliers,
 - discriminating on price,
 - selling below cost (predatory pricing), or
 - imposing overly restrictive exclusive dealing arrangements.

1-5 | Bribery and Corruption



We do not bribe anyone, anywhere, for any reason under any circumstances.

- We are committed to complying with all applicable anti-corruption laws, rules and regulations, and never offer or give a bribe or allow others to bribe on our behalf.
- We do not make Facilitating Payments* even if allowed under local law or if doing so is common in society.
- We follow the Company's internal rules when giving or receiving gifts, meals, travel and other entertainment.
- We only do business with third parties who we know do business with integrity, after conducting appropriate due diligence. When third parties engaged by TEL Group participate in misconduct or violate the law, they put TEL Group at risk for legal violations and reputational harm.

- Bribery occurs when anyone authorizes, offers, solicits, gives, receives or accepts anything of value, or any financial or other advantage, in exchange for favorable treatment by a company, government authority, official or employee or relating to their duties. In China, for instance, we should understand that the local laws also regulates commercial bribery. It would be illegal even if the recipients are their close relatives.

- A "bribe" typically takes the form of cash, but also includes entertainment (e.g. meals and beverages, attendance of sporting events and performances), gifts, tours in connection with visits to Company facilities, travel invitations (e.g. training trips lacking a legitimate purpose), healthcare services, employment including employment of relatives of Public Officials and sexual services, etc. Payment made in disguise of donations or sponsorships could also constitute bribes.
- Most countries enforce laws prohibiting bribery and corruption. Many of these laws apply even when the wrongful conduct is committed outside the country's own borders and/or by citizens of other countries, such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977.
- Violations of these laws can result in criminal and civil liability, including prison sentences and fines for individuals.
- The Company will conduct periodic anti-corruption training for all directors and officers, and, where appropriate, employees, agents and business partners.

*Facilitating Payment – a small payment paid to public officials to facilitate non-discretionary actions or services such as obtaining an ordinary license, business permit or visas.

1-6 | Conflicts of Interest



We make fair and objective decisions in the best interest of the Company, and avoid any action that puts our personal interests ahead of those of the Company's.

- We have a responsibility to avoid activities which conflict or appear to conflict with our professional responsibilities. Even the appearance or perception of a conflict of interest can place the Company at risk.
- We should never allow personal gain or benefit to prevent us from doing what is in the best interest of the Company. Examples are:
 - ▶ Receiving personal privileges from a supplier;
 - ▶ Concurrent employment as a board member or as an employee of another company or organization;
 - ▶ Business with a company that a close relative or friend manages/owns;
 - ▶ Bringing an unjustifiable financial interest in any company or a current or prospective customer, supplier or competitor of the Company or receiving improper personal benefits or gifts;
 - ▶ Supervising the job performance or compensation of a relative or romantic partner as a part of the day-to-day job duties;
 - ▶ Engaging in an activity which competes directly or indirectly with the Company; and
 - ▶ Engaging in any transaction that involves a former Company employee or officer or any close relative of such ex-employee in providing goods and services.

- A conflict of interest occurs when a personal relationship or activity exists that may influence our judgment or ability to perform our job objectively or to uphold our duties to the Company.
- It is our responsibility to disclose any actual or potential conflicts of interest to the Company voluntarily and proactively. In most cases, disclosed conflicts can be cleared by an open and transparent discussion.

1-7 | Political Activities and Contributions



We do not, directly or indirectly, support or make contributions to political parties or candidates using Company finances or assets.

- We are committed to complying with all applicable campaign finance laws, rules and regulations.
- While TEL Group does not support or contribute to political parties or politicians including candidates, employees may offer support and contributions* to political groups in a personal capacity and on their own time.
- We ensure that:
 - ▶ Any contributions towards, and support for, political parties are clearly personal and give no impression of being connected to TEL Group; and
 - ▶ No personal political support or contributions affect performance or objectivity on the job.

*Support and contributions include financial contribution, benefits in kind, gifts, sponsorships and use of any Company resources.

1-8 | Money Laundering



TEL Group does not receive the proceeds of criminal activities, as this can amount to the criminal offence of money laundering. Nor do we engage in any relationships with “antisocial organizations.”

- We are committed to complying with all applicable anti-money laundering laws, rules and regulations.
- We look out for warning signs of money laundering, such as:
 - ▶ Supplier requests to:
 - Pay funds to a bank account in the name of a third party or outside their country of operation;
 - Make payments outside the normal form of business;
 - Split payments to several bank accounts; or
 - Overpay.
 - ▶ Customer payments to TEL Group:
 - From multiple bank accounts or ones overseas when not a foreign customer;
 - Made in cash when normally made by checks or electronically,
 - Received from third parties; or
 - Made in advance when not part of normal terms of business.

- ▶ Use of a paper company and P.O. Box as the third party address
- ▶ Transactions that do not make obvious commercial sense
- We do not do any business with antisocial organizations and firmly refuse improper demands from such organizations.
- The Company conducts appropriate due diligence on certain customers and vendors to identify potential money laundering risks.

- If you suspect money laundering or transaction with antisocial organizations, please consult with your Legal/Compliance Department immediately.



Money laundering – the illegal process of concealing the origins of money obtained illegally by passing it through a complex sequence of banking transfers or commercial transactions.



Antisocial organizations – refers in Japan to gangs and other parties who hinder social order and safety of citizens and/or business activities by gaining economic benefit with unfair demands through violence, threat, and fraud. Such organizations may disguise their intentions to take advantage of innocent citizens by masquerading as ordinary businesses or organizations seeking donations or participation in business, sending unsolicited publications and demanding payment or subscription in return, etc.



2 Our Assets & Property



Responsible disclosure and guarding of information

We disclose financial and accounting details when appropriate, and have the responsibility to guard important information assets and intellectual property.

2-1 | Accounting/Tax/ Financial Reporting



We prepare financial documents in a timely, accurate and appropriate manner, disclosing all accounting and financial reports in accordance with relevant laws and regulations, and generally accepted accounting principles.

- We document and reflect the Company's business activities and economic information including financial statements, expense reports, contracts, internal & external reports and tax filing in a timely, accurate and complete manner based on facts and evidence and accordance with related laws and regulations, accounting principles and internal rules.
- We keep business records in accordance with applicable laws and regulations, and the Company's own internal rules regarding the preparation of such documents.

- We assure that documents and records related to internal and external investigations or audits, as well as pending or potential litigation, be retained properly upon request from our Legal Department and/or any other relevant departments.



For the TEL Group Tax Policy, please refer to the following website at:

<https://www.tel.com/csr/related-policy/>

2-2 | Insider Trading



We do not use material non-public or non-disclosed inside information about TEL Group or any other company, including suppliers and customers, to buy, sell, or otherwise transact in securities of TEL Group or any other publicly traded company.

- We do not make profits by trading securities using material non-public or non-disclosed inside information.
- We do not recommend or suggest to others to buy, sell, or otherwise transact in securities using material non-public or non-disclosed inside information.
- We do not communicate regarding material non-public or non-disclosed inside information to others who might trade on the basis of such information, tip the information to others, or otherwise misuse the information, whether verbally or by any other means.

- Examples of inside information include the following:
 - ▶ Business results or forecasts for a company
 - ▶ Changes in management or board of directors or other governing body of a company
 - ▶ Major new product, product claim or product incident/issue

- ▶ Loss, delay or gain of significant contract, sale or order
 - ▶ Acquisition, merger or divestment
 - ▶ Major developments in litigation cases or in dealings with regulators or governments
 - ▶ Revisions in dividend policy
 - ▶ Issuance of stock and stock acquisition rights, stock buy-back, and stock split
 - ▶ Changes in or dispute with a company independent auditor
 - ▶ Default in debt or bankruptcy filing
- Trading or encouraging others to trade on material non-public or non-disclosed inside information, or giving it to unauthorized parties, is a criminal offense in many jurisdictions. A breach of the applicable laws can lead to fines and/or imprisonment against the individual who passed the information even if he/she does not personally gain.
 - Trading securities through third parties such as family members, friends, and/or agents, is also not allowed.



Insider Trading – the buying or selling of a security (e.g. shares, equities and related derivatives) of a listed company by investors (individuals or legal entities) with access to non-disclosed material information (inside information) about the company. This is prohibited by laws, and the Company is committed to complying with all applicable insider trading laws, rules and regulations.

2-3 | Intellectual Property



We respect intellectual property and protect, manage, and utilize it appropriately.

- We are committed to complying with all applicable intellectual property laws, rules and regulations, and we secure and protect the use of these valuable assets.
- We take precautions to protect our intellectual property and confidential business information.
- We do not use TEL Group intellectual property and confidential business information outside of the office without permission.
- We respect and do not misuse intellectual property and confidential business information of others. We do not use other's intellectual property and confidential business information without authorization or an appropriate license.

- Below are some examples of intellectual property rights:
 - Patent Right · Utility Model Right · Design Right
 - Trademark · Copyright · Trade secret
- We do not discuss or share TEL Group or third party intellectual property and confidential business information in public places, such as airports and restaurants.

- We do not bring to TEL Group any intellectual property and confidential business information of a former employer or other third party, or utilize for the benefit of or disclose to TEL Group any intellectual property and confidential business information of any former employer or third party, without prior written authorization from the former employer or third party and unless necessary to further a business purpose.
- We immediately notify the Company, in the designated manner, when in the scope of our work we create an innovation, invention, idea, design using the physical or technical assets of TEL Group.
- We consult with the designated department before using TEL Group intellectual property, such as trademark or copyright, outside the Company.

2-4 | Information Security



We protect TEL Group confidential business information as well as any confidential business information that is entrusted to the Company by our customers and business partners, and prevent information leakage by maintaining a reasonable and appropriate information management framework and complying with rules concerning the handling and protection of confidential business information including personal information.

- We appropriately protect and manage confidential information such as technical and sales information, and only use TEL Group confidential business information for legitimate business purposes or as required by law.
- We do not misuse or improperly obtain confidential business information from third parties.

- We define the classification of information and scope of disclosure, control such information, and only disclose confidential business information on an as-needed basis and in accordance with company policy. Examples of confidential information are: detailed sales information, business performance targets, key performance indicators, product strategies, new product and technology, pending personnel announcements, manufacturing processes and equipment designs, and contracts with customers.
- We take care not to disclose confidential business information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace.
- We do not disclose confidential information beyond its authorized limits while employed at the Company.
- Upon the end of employment, we must erase, destroy or return electronic files and material objects that contain confidential information, and shall sign written acknowledgement of such action. It is absolutely impermissible to keep the confidential information after the end of employment.

- Below are some examples of methods to prevent information leakage and loss:
 - ▶ Do not open an attachment and/or URL when you receive a suspicious email;
 - ▶ Do not let others know or use your password;
 - ▶ Pay close attention to the companies' devices with confidential information; especially when outside the Company, in transit, etc.;
 - ▶ Ensure any removable TEL Group IT equipment, including devices, are secured when left in the office overnight and are locked away or out of sight when left unattended off premises; and
 - ▶ Do not install software without Company's approval.
- The Company may monitor, record or use any communication made by using the Company's information system (e.g., email and internet) to the extent permitted by local laws and regulations.
- Officers and Employees must immediately report the loss or theft of any TEL Group equipment, or any personal device used to store TEL Group information or any actual or potential incidents of information leakage to the information security department.



For the TEL Group Information Security Management, please refer to the following website at:

<https://www.tel.com/about/riskmanagement/>

2-5 | Personal Data



We respect the privacy of all individuals and confidentiality of Personal Data and handle Personal Data with utmost care and take measures to promote the appropriate handling of Personal Data.

- We comply with each country/region's law, regulations, and internal Company rules regarding Personal Data protection. We collect, use and retain Personal Data on a minimum basis to the extent our business needs and dispose it when no longer necessary.
- We always consider the privacy risks before we collect, use, or retain or disclose Personal Data, such as in a new system or part of a project.
- We endeavor to keep Personal Data accurate and up-to-date.
- We protect the Personal Data we hold by ensuring we have effective safeguards in place so it does not fall into the wrong hands.
- We are transparent with individuals about how we use, disclose or transfer their Personal Data. We also make it easy for individuals to access and correct their information.

- Personal Data is information about any existing individual including the following:
 - ▶ information that can identify a specific individual such as name, date of birth or other descriptors
 - ▶ information that can be collated with other information and can identify a specific individual
- Many of the laws and regulations related to Personal Data are extraterritorially applied; therefore, when handling personal information, it may be necessary to understand and follow not only the laws and regulations in your country, but also the other country/region.



For the personal information protection policy, please refer to your market's specific policies.



If you receive any contacts from outside parties regarding the usage of personal information of TEL Group or data breach, immediately consult with your local Legal/Compliance Department.

2-6 | Company Assets



We do not improperly use company assets for our own personal benefit.

- We rely on company assets to support our work every day. We use computers, mobile devices, information technology hardware and software, vehicles, facilities, intellectual property, supplies and other assets with our care and for legitimate and appropriate business reasons.
- We do not use, waste or take the property of TEL Group out of the Company's facilities without the Company's permission regardless of whether it is tangible or intangible.

- We may not install software that the company purchased on a home PC, or use a company PC for personal purposes.
- Improper usage of company assets (as above) would not only be a violation of the internal rules but could also constitute a criminal offense.
- Below are some examples of assets that are considered company assets.

Tangible	Intangible
Facilities	Software
Equipment	Confidential Information (customer information, market share information etc.)
Raw materials	Intellectual property rights such as patent rights
Office supplies	



3 Our Workplace



Teamwork through diversity

TEL Group promotes a workplace where employees interact respectfully and work with peace of mind. In so doing, we nurture the unique abilities of TEL Group's diverse members working together to become an organization that makes full use of their talents.

3-1 | Human Rights & Fair Employment Practices



We are committed to fostering a workplace that is respectful, inclusive and safe by promoting human rights and diversity and complying with all laws and regulations pertaining to labor practices, freedom of association, collective bargaining, and immigration. We also do not engage in discrimination or support forced labor, debt labor, child labor or any other form of modern slavery.

- We make all employment-related decisions based on merit.
- We respect each other, and do not discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, childcare/nursing responsibilities, or any other protected personal characteristic under applicable law.
- We respect and strive to understand different customs and values of our colleagues.

- TEL Group respects the human rights described in the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.
- TEL Group considers that the following human rights are particularly important:
 - ▶ freedom, equality & non-discrimination
 - ▶ freely chosen employment
 - ▶ product safety & workplace health and safety
 - ▶ freedom of association
 - ▶ appropriate working hours & breaks/holidays/vacations



For the Tokyo Electron Group Human Rights Policy, please refer to the following website at:
<https://www.tel.com/sustainability/management-foundation/human-rights/index.html>

3-2 | Workplace Free of Harassment



We do not allow any form of harassment and are committed to creating and safeguarding an environment where every person feels respected and valued, and where everyone is treated equally and fairly.

- We respect each person as an individual and endeavor to create a working environment that allows people to fully display their abilities.
- We do not engage in any behavior that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, childcare/nursing responsibilities or any other protected personal characteristic under applicable law.
- We do not engage in any behavior which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicitly nature, unwelcome sexual advances or engaging in any other conduct with sexual overtones, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumors.

- Violence and threats of violence are also unacceptable.
- All supervisors are responsible for promoting and maintaining a harassment-free work environment.

- TEL Group deals with any type of harassment seriously; discipline may include termination of employment.
- There will be no tolerance for retaliation against those who have reported concerns regarding harassment in good faith.
- Harassment is unwelcome and offensive conduct that may interfere with a person's ability to perform his or her work. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment.
- Sexual harassment can entail the harassment of a woman by a man or a man by a woman, as well as same-gender harassment.



The “workplace” means not only the regular places of work, but other places where meetings and interaction among personnel may occur, including customer facilities, restaurants, and other social settings.



4 Responsibilities to the Public



A symbiosis of people, society, and nature

We strive for our business activities to be in harmony with the global environment as well as the success of our communities. We continue in the pursuit of cutting-edge technology and working toward a sustainable society.

4-1 | Environmental Preservation



We are committed to upholding laws and regulations related to environmental protection and conservation, and conduct business activities while maintaining harmony with the global environment.

- We strive to produce environmentally friendly products with the TEL Group Environmental Policy.

- In order to reduce the burden on the environment, we aspire to promote the creation of environmentally friendly products from the product development stage stated as below:
 - ▶ Limiting materials used and waste generated;
 - ▶ Using recyclable products; and
 - ▶ Placing priority on the use of safer alternatives to hazardous substances.
- It is important to understand that technological development may entail risks to the life and assets of individuals as well as to the global environment.



For the TEL Group Environmental Policy, please refer to the following website at:

<https://www.tel.com/csr/environment/environmental-management/>

4-2 | Corporate Social Contribution



We strive to build solid, trustworthy relationships with community members to help develop local communities and resolve social issues at the global level through various activities.

- Our social contribution activities are based on the principles of the corporate philosophy, in accordance with the TEL Group Social Contribution Guidelines, and are working in line with the United Nations Sustainable Development Goals (SDGs).
- We follow proper procedures when making donations through TEL Group initiatives.



For information on TEL's Social Contribution, please refer to the following website at:

<https://www.tel.com/csr/contribution/>

My Code of Ethics

As a member of TEL Group striving for sustainable growth together, I am:

- Committed to doing the right things,
- Aware of risk around us, and
- Knowledgeable on doing things right.



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