

# Compliance

The Tokyo Electron Group acts in strict compliance with corporate ethics and applicable laws to ensure that its corporate activities are fair and reliable.

## Stance on Corporate Ethics and Legal Compliance

The lifeline of the Tokyo Electron Group is trust. The basis for maintaining this trust is for each individual employee and organization within the Group to strictly conform to our corporate ethics standards and comply with applicable laws and regulations. In carrying out our business activities, we have placed the highest priority on compliance with strict ethical standards and laws.

## Adopting Ethical Standards

Based on the belief that shared standards are necessary for the creation of a globally excellent company, we adopted a "Code of Ethics" in 1998 as a detailed statement of our stance on ethical standards; and that same year we established the Ethics Committee as an operational organization.

We revised the Code of Ethics in June 2007 in response to the results of a survey on the status of compliance. We made the code easier to understand and made certain changes that reflect the current business environment.

To enhance understanding of the Code of Ethics, we also revised a booklet that contains the code and explains its content in a Q&A format, which we distributed to all Group officers and employees, including overseas personnel.

### The Code of Ethics of Tokyo Electron Group

#### Introduction

#### I. Principles

1. Compliance with Applicable Laws
2. Acting in Accordance with Social Conscience
3. Maintaining Harmonious Relationships with Local Communities

#### II. Honest and Fair Business Activities

- II -1 Technology, Safety, and the Environment
  4. Ensuring Safety and Pursuing Quality
  5. Promoting Environmental Preservation Activities
  6. Ethics in Manufacturing
- II -2 Fair Trade
  7. Implementing Fair and Open Competition
  8. Fair Business with Suppliers
  9. Handling of Confidential Information
  10. Strict Export/Import Controls
  11. Reasonable Exchanges of Gifts and Entertainment within the Bounds of Common Sense

- II -3 Relationship between the Company and Individuals
  12. Prohibition of Conduct Causing Conflicts of Interests
  13. Prohibition of Improper Use of Company Assets
  14. Prohibition of Conduct of Harassment

#### III. Being a Good Corporate Citizen

15. Prohibition of Insider Trading
  16. Prohibition of Political Activities and Contributions
  17. Prohibition of Involvement in Antisocial Forces
  18. Respect for Individuals
- Implementation of the Code of Ethics\*

\* The "Implementation" section provides specific matters and procedures.

## Measures to Reinforce Compliance Systems

The Tokyo Electron Group adopted Compliance Regulations specifying basic matters regarding compliance. These

regulations are intended to ensure proper understanding of applicable laws and regulations, international rules, and internal rules by all persons engaged in the business operations of the Group, while also ensuring that conduct accords with those guidelines at all times.

The Group also has a hotline (internal reporting system) for use by employees and others to directly report on suspected violations of the Code of Ethics or applicable laws and regulations. Matters are dealt with fairly and in good faith by the Chief Business Ethics Director and the Business Ethics Committee Chairman in the case of matters regarding the Code of Ethics, and by the Director of the General Affairs Department in the case of matters concerning compliance, taking into consideration the employee who made the report and other factors.

In August 2008, the Compliance Regulations were adopted for overseas group companies and hotlines were established at overseas sites. In addition, the Group appointed an Executive Officer in charge of Compliance & Internal Control in April 2009 to raise awareness of compliance and strengthen enforcement within the Group.

We are also distributing information concerning these compliance-related activities via our intranet, conducting Web-based training and carrying out other programs to ensure that employees understand compliance policies, thereby raising awareness of compliance and strengthening our compliance systems.

## Protection of Personal Information

When the Act on the Protection of Personal Information came into full effect in April 2005, the Tokyo Electron Group adopted a basic policy and regulations concerning the protection of personal information, while preparing various guidelines and manuals regarding the handling of personal information. We are also conducting Web-based training for employees, distributing information via our intranet, and taking other measures to ensure the proper implementation of these policies and regulations when conducting business operations. In addition, we identified personal information stored on PCs loaned to employees using software to better understand the current status of personal information.

The Group has also taken a variety of measures to reinforce the management of personal information, including: installing servers specially equipped to handle the storing of personal information, storing important personal information exclusively on those servers, restricting employees' individual access to PCs by using IC cards, changing passwords periodically, introducing encryption functions, and using auxiliary storage units with password-based access control.