

The Tokyo Electron Group CSR Policy

Code of Ethics

I. The Code of Ethics

1. Compliance with Applicable Laws	Tokyo Electron Group board members and employees must comply at all times with the applicable laws and regulations of each country and region as well as with international regulations, in doing the global business activities, while abiding with corporate ethics and putting them into practice in a spirit of good faith.
2. Acting in Accordance with Social Conscience	Tokyo Electron Group board members and employees must act in accordance with social conscience based on a high ethical awareness.
3. Maintaining Harmonious Relationships with Local Communities	Tokyo Electron Group board members and employees must be aware that both themselves and the company are members of their local communities, and must strive to achieve mutually beneficial development while collaborating with these communities.

II. Honest and Fair Business Activities

II-1 Technology, Safety, and the Environment

4. Ensuring Safety and Pursuing Quality	Tokyo Electron Group board members and employees must ensure safety and pursue quality in all their business activities including development, manufacturing, sales, service, and administration.
5. Promoting Environmental Preservation Activities	Tokyo Electron Group must conduct its business activities while maintaining harmony with the global environment.
6. Ethics in Manufacturing	Tokyo Electron Group board members and employees must engage in manufacturing with a high ethical awareness and a spirit of good faith.

II-2 Fair Trade

7. Implementing Fair and Open Competition	Tokyo Electron Group must not engage in any conduct that hinders competition in fair and open markets.
8. Fair Business with Suppliers	Tokyo Electron Group selects suppliers based on fair standards. When conducting business with suppliers, we must not use our dominant bargaining position in a transaction to unfairly harm the interests of suppliers.
9. Handling of Confidential Information	Tokyo Electron Group board members and employees must strictly manage confidential information of the company with special care and must not disclose or improperly use confidential information during the term of their employment or after retirement from the company without following the proper procedures according to the company's internal regulations and non-disclosure agreements. In addition, the confidential information of other companies must be respected and properly managed and must not be obtained by improper means.
10. Strict Export/Import Controls	Tokyo Electron Group board members and employees must comply with all applicable laws and the company's regulations based thereon concerning the import and export of goods and transfers of technology.
11. Reasonable Exchanges of Gifts and Entertainment within the Bounds of Common Sense	Tokyo Electron Group board members and employees must not give gifts to, or receive them from, a company or individual based on a business relationship, beyond the bounds of common business practice in the relevant location. Giving or receiving gifts of cash or cash equivalents is prohibited, regardless of the amount (except for purposes recognized as appropriate in common practice, such as condolences or expressions of sympathy in some countries and regions). Furthermore, entertainment with companies or individuals with whom one has a work-based relationship must be carried out moderately within the bounds of common sense.

II-3 Relationship between the Company and Individuals

12. Prohibition of Conduct Causing Conflicts of Interests	Tokyo Electron Group board members and employees must not, without due cause, engage in conduct that is to their own personal benefit and contrary to the interests of the company (conduct causing conflicts of interests), or which runs the risk of leading to such conduct. In addition, Tokyo Electron Group board members and employees must not use their position in their work for their own personal benefit.
13. Prohibition of the Improper Use of Company Assets	Tokyo Electron Group board members and employees must not improperly use company assets for their own personal benefit.
14. Prohibition of Conduct of Harassment	Tokyo Electron Group does not allow any form of harassment in the workplace.

III. Being a Good Corporate Citizen

15. Prohibition of Insider Trading	Tokyo Electron Group board members and employees must not engage in the purchase or sale of stocks on the basis of information not disclosed to the public that they obtained in connection to their work duties or business transactions (insider trading).
16. Prohibition of Political Activities and Contributions	Tokyo Electron Group board members and employees must not engage in political activities at the workplace. In addition, Tokyo Electron Group does not make donations of money or company assets to politicians (including candidates) or political parties.
17. Prohibition of Involvement in Antisocial Forces	Tokyo Electron Group must not have any relationship, including business relationships, whatsoever with antisocial forces that are likely to disrupt the public order, safety of the public, or corporate activities. In addition, Tokyo Electron Group must not provide any financial support or accommodation for any reason to antisocial forces.
18. Respect for Individuals	Tokyo Electron Group prohibits discrimination on the basis of gender, nationality, age, race, creed, religion or any other reason, while respecting each person as an individual. Tokyo Electron Group does not use forced labor or child labor.

Personnel Policy

Respect for Human Rights	We respect the character and individuality of each person and strive to create work environments without any infringement of human rights.
Diverse Workforce	We strive to respect and understand differences in values arising from gender, nationality, age, race, creed, religion, and other attributes and to be a corporation where a diverse range of employees can work to their full potential.
Human Resource Development	We believe that each employee is the source of value creation and support the development of skills by employees.
Employee Assessment and Treatment	We provide opportunities to those employees with the enthusiasm for personal growth and engage in fair evaluation of skills and employee treatment so that employees with significant results can be rewarded.
Occupational Safety and Health	We place the highest priority on ensuring the safety and health of employees and maintain environments such that employees can work safely at our workplaces and local residents feel a sense of reassurance.
Work-Life Balance	We implement measures to enable employees to achieve a good work-life balance.

Safety Policy

Safety First	Based on the principle of "safety first," we strive to create safer products and work to maintain and improve the safety of all people involved with our products and healthy workplace environments.
Pursuit of Safe Technologies	With an awareness of the factors that impair safety and health in our various business activities, we continuously strive to create safer and more secure workplaces by making improvements concerning those factors and through intrinsically-safe equipment designs and superior service capabilities.
Management and Employees' Responsibility	All employees maintain an awareness of potential problems and of the need for improvement concerning the maintenance and enhancement of safety and health at all workplaces, and management and employees act in accordance with their respective responsibilities.
Legal Compliance	We comply with safety and health laws and regulations and international rules, take into consideration industry guidelines, and strive to promote safety and health.
Collaboration and Cooperation with Society	Based on common understanding with a broad range of stakeholders, we cooperate and collaborate with society and work to appropriately meet their expectations.

Quality Policy

Quality Always	Quality is not only the foundation for customer satisfaction, but also the foundation for meeting expected production schedules and reducing downtime. We prioritize quality over temporary cost increases.
Quality Design and Assurance	We build quality into every TEL product during the design phase by focusing on leading-edge technology. By bringing quality into our processes early and focusing on quality throughout all processes, we succeed in providing high quality products and services.
Quality and Trust	When we find a quality problem, manufacturing, sales and service departments analyze the facts and complete a thorough investigation to determine the cause, resolving the problem as quickly as possible. Our customer can trust in our commitment to address identified quality problems.
Continuous Improvement Activities	We improve quality with an effective quality management system. This includes using quality measures, improving by applying the PDCA cycle, and practicing continuous improvement activities.
Communication with Stakeholders	In addition to providing product quality information in a timely manner, we understand and align to the expectations of our stakeholders.

Environment Policy

Environmental Goals and Continuous Improvement	We continually enhance its knowledge of environmental issues to establish voluntary goals that are reviewed by Executive Management and drive continuous improvement and full regulatory compliance.
Promotion of Environmental Technology	We aim to invest in the development of leading-edge, high value products and services that directly contribute to a sustainable society.
Environmental Contribution with Product	We develop eco-friendly products through our leading-edge technology. We cooperate with our customers and suppliers to strive for the prevention and improvement of a wide range of environmental concerns.
Operational Environmental Impact Reduction and Preservation	We quantitatively analyze and reduce the environmental impact of our global operations with activity from all levels of employees and operations.
Collaboration and Cooperation with Stakeholders and Society	We actively promote collaboration and cooperation with all our stakeholders to achieve mutual understanding and conformance to expectations.

Procurement Policy

Compliance with Applicable Laws and Social Norms	We engage in procurement activities with integrity in compliance with the laws and regulations of each country and social norms based on our corporate ethics.
Priority on the Environment	We conduct procurement with full consideration for reduction of environmental impact and protection of the global environment.
Fair Business Practices	We continuously seek high-value technologies and create broad opportunities for their business transactions based on the precondition of open competition.
Partnership	We prioritize relationships of trust based on mutual understanding with suppliers and conduct activities in the pursuit of mutual continuous growth.
Information Management	We properly manage the confidential information of suppliers that we obtain in the course of business.