



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.