

Compliance

We emphasize not only compliance with laws and regulations but also compliance with internal codes and ethical codes. As well as conducting awareness-raising activities so that each person in the ULVAC Group acts with a spirit of compliance, we have established and are operating a range of institutions and regulations to ensure thorough compliance.

Corporate Code of Conduct

In order to further promote fair and highly transparent corporate management, ULVAC has established the Corporate Code of Conduct, to which all officers and employees are required to adhere, and conducts education. In addition, booklets are distributed to Group companies to raise awareness about the importance of compliance. We use this Corporate Code of Conduct as guidelines for asking ourselves whether our business conduct is "in the best interest of our customers," "correct in light of laws and social ethics," and "does not infringe human rights."



Compliance Education

We conduct company-wide education on compliance, prevention of insider trading, prevention of harassment, prevention of misconduct in research activities, etc., for all employees of ULVAC, Inc. every year and the attendance rate is 100%. The education is designed to raise awareness not only in terms of knowledge but also to enable our employees to act appropriately.

Whistleblowing System

In addition to a whistleblowing system operated via the Manager of the Internal Auditing Department for which independence is secured in accordance with the Whistleblower Protection Act, we have also established an external whistleblowing contact. The system is structured such that confidentiality is ensured throughout the process of investigating the content of reports. By putting in place a whistleblowing system that allows whistleblowers to feel secure in their reporting, we aim to detect any misconduct early and take appropriate corrective action.

After a whistleblower report has been received, the initial response is for the Compliance Committee of ULVAC, Inc. to conduct an investigation in order to establish the facts. This investigation is particularly mindful of fairness, and is conducted judiciously and thoroughly. If necessary, assistance may be sought from external specialists, and thorough interviews that are as wide-ranging as necessary are conducted and analyzed.

The president chairs the Compliance Committee and the members of the Committee observe a strict duty of confidentiality in carrying out their duties.

Handling of Violations

In the event that, based on the results of an investigation by the Compliance Committee, it is deemed that a violation of laws or regulations has been committed, then the opinion of an external specialists, such as a lawyer, may be sought as necessary, steps will be taken to ensure that the violation ceases with immediate effect and improvement measures will be implemented, and those involved in the violation will be dealt with after deliberation by the appropriate bodies. In addition, the root causes of the violation are also investigated in order to formulate effective measures for preventing recurrence.

Corporate Code of Conduct

1	Excellent Products, Services, and Safety	10	Assurance of Safe and Healthy Work Environment
2	Sound, Corporate Association with Business Partners and Affiliated Companies	11	Compliance with Laws or Ordinances
3	Promotion of Maintenance of Fair and Free Competition	12	Insulation from Anti-Social Forces
4	Protection of Intellectual Property Rights	13	Disclosure of Information
5	Corporate Secrets	14	Global Environmental Protection
6	Client Information	15	Local Contribution
7	Respect for Employees' Personality and Individuality	16	Global Business Activities
8	Respect for Privacy	17	Thorough Implementation of Corporate Ethics
9	Respect for Human Rights and Nondiscriminatory Treatment	18	Pronouncements by Individuals

With Our Stakeholders

In order to resolve social issues and co-create sustainable corporate value, we vigorously engage in dialogue with stakeholders and respond in a timely manner to changes in the market and business environment in which ULVAC operates.

Dialogue with Employees

At the start of a new fiscal year and at the New Year's reception, video messages from the ULVAC president and senior management are distributed to all Group companies in order to share ULVAC's status and policies with employees, including those overseas. A questionnaire survey is conducted coinciding with each such video message to check the level of employees' understanding and collect their opinions, which are then fed back to management and reflected in the planning of the next video project.

Collaboration with Business Partners

Through various briefings and information exchanges, we strive to share information relevant to business and request our business partners for their understanding and cooperation in enhancing communication on CSR procurement.

[For details](#) [P.47](#) Procurement

For Customer Satisfaction

In order to enhance customer satisfaction, we strive to improve the quality of our products and services based on the quality management system in accordance with the ISO 9001 standard. ULVAC's 31 Group companies obtained ISO 9001:2015 certification for the integrated management system. Quality management is promoted by way of thorough analysis of nonconformities that occurred at a process within the process, implementation of recurrence prevention measures, feedback of findings, implementation of preventive measures, and process standardization activities. Furthermore, in order to achieve customer satisfaction in all phases from product delivery to disposal, we are working to reduce running costs, shorten lead times, and provide prompt, high-quality customer support.

[For details](#) [Website > Sustainability > Quality Assurance and Product Safety](#) [For details](#) [P.20](#) Customer Support

Dialogue with Shareholders and Investors

We strive to provide our shareholders and investors with timely, fair, and easy-to-understand information about the Group's mid-term management plan, growth strategy, and financial condition, in order to facilitate their understanding.

Regarding investor relations, in addition to quarterly financial results briefings, we actively offer opportunities for dialogue by organizing technical seminars, taking part in conferences sponsored by securities companies both in Japan and overseas as well as seminars for individual investors, and holding road shows overseas, plant tours, and personal interviews.

We disclose financial results briefing materials and summaries of Q&A sessions, integrated reports, fact sheets, etc. on our website. We strive to enrich disclosure information and for swifter disclosure. From the viewpoint of fair disclosure, we disclose information in Japanese and in English simultaneously to the extent possible.

Evaluations and opinions obtained through dialogue with shareholders, investors, and analysts are collected and summarized on a regular basis and are reported to the Board of Directors and at the Management Council to share them with management, depending on the importance and nature of such opinions, so as to reflect them in improvement of management measures, etc.

We will continue our efforts to strengthen communication with shareholders and investors through vigorous IR activities, with the aim of realizing sound corporate management and maximizing corporate value.

IR activities	Results in FY 2022
Financial briefing	4 times
IR interviews with institutional investors and analysts	Approx. 690 persons
Participation in conferences for overseas institutional investors	28 conferences
IR interviews on road shows overseas	20 interviews
Plant tours	9 times
Seminars for individual investors	3 times

Dialogue with Local Communities

In addition to contributing to society through our core business, we strive to make social contributions that benefit local communities, focusing on "Local Communities," "Environment" and "Education Support for the Next Generation."

[For details](#) [Website >> Sustainability > Social Contribution Activities](#)