

# 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 more 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 a guideline for asking ourselves whether our business conduct is “in the best interest of our customers,” “correct in terms of laws and social ethics,” and “does not violate 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 every year, achieving a 100% attendance rate. The education is designed to raise awareness not only by providing knowledge but also by encouraging appropriate actions.

## 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 hotline. 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 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 to conduct extensive interviews and analyses as required.

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 and regulations has been committed, the opinion of external specialists, such as lawyers, may be sought as necessary. Immediate suspension of the violation and implementation of improvement measures will be carried out, and appropriate measures will be taken against those involved 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 and Healthy Relationships with Business Partners and Affiliates	11	Compliance with Laws and Regulations
3	Promotion of Maintenance of Fair and Free Competition	12	Severance ofTies with 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	Individual Commitments



# 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 directly relevant to our business and ask 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 thorough analysis of nonconformities occurring within each 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>> ISO 9001 Certification > Quality Assurance and Product Safety > Sustainability > ULVAC, Inc.

For details [»P.38](#) 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 medium-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 IR seminars, participating in conferences sponsored by securities companies in Japan and overseas, as well as in seminars for individual investors, and holding overseas roadshows, plant tours, and individual meetings.

We disclose financial results briefing materials, summaries of Q&A sessions, integrated reports, fact sheets, and other materials on our website. We strive to enhance the content and timeliness of our disclosures. From the viewpoint of fair disclosure, we disclose information in Japanese and 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 the Management Council to share them with management, depending on their importance and nature, to incorporate them into management improvements as appropriate.

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

## 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>> Social Contribution Activities > Sustainability > ULVAC, Inc.

IR activities	Results in FY2023
External engagement	
Financial briefing	4 times
IR interviews with institutional investors and analysts	Approx. 789 persons
Participation in conferences for overseas institutional investors	29 sessions
IR interviews on overseas roadshows	24 individuals
Plant tours	11 times
Seminars for individual investors	3 times
IR seminar	1 session
Internal engagement	
IR Monthly Report	Issued monthly
Reports at Board of Directors and Management Council	8 times