

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 systems and regulations to ensure thorough compliance.

ULVAC Group Corporate Code of Ethics

ULVAC, Inc. has signed the United Nations Global Compact, a global initiative. The ULVAC Group Corporate Code of Ethics has been established to share the Group's basic corporate philosophy and further promote fair and highly transparent corporate management. Since its establishment, the code has been communicated through education to all officers and employees. In addition, booklets are distributed to Group companies to raise awareness about the importance of compliance. In October 2025, the code was revised to strengthen ethical conduct, Proper Handling of Information, enhancement of human capital, and respect for human rights in response to global environmental changes and in alignment with international norms such as the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The ULVAC Group Code of Corporate Ethics was established following deliberation and approval by ULVAC's Management Council and Board of Directors.



Compliance Education

We conduct 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 line with the requirements of laws and regulations such as the United Nations Guiding Principles on Business and Human Rights, which calls for the establishment of grievance mechanisms, and Japan's Whistleblower Protection Act, we have established both an internal whistleblowing contact point with assured independence and an external reporting contact point. 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 report with confidence, under their real names or anonymously, we aim to detect any misconduct early and take appropriate corrective action. We protect the personal information and privacy of whistleblowers and do not tolerate any retaliation or harassment against them.

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.

ULVAC Group Corporate Code of Ethics

Introduction		
Research and Development, Products, and Services	1	Safe and High-Quality Products and Services
	2	Creative Product Development and Technological Innovation
	3	Ethical Research and Development
Ethical Conduct	4	Compliance with Laws and Regulations and Respect for International Norms of Behavior
	5	Appropriate Accounting Practices and Tax Payment
	6	Appropriate Import and Export Control
	7	Fair Trade and Competition
	8	Prevention of Bribery and Corruption
	9	Prohibition of Conflicts of Interest
	10	Prohibition of Insider Trading
	11	Prohibition of Money Laundering
	12	No Relationship with Anti-Social Forces
	13	Responsible Procurement Practices
Proper Handling of Information	14	Appropriate Information Management
	15	Ensuring Information Security
	16	Timely and Appropriate Disclosure of Information
	17	Protection of Intellectual Property
Enhancement of Human Capital and Respect for Human Rights	18	Respect for Privacy and Protection of Personal Information
	19	Appropriate Communication of Information
	20	Respect for Human Rights
	21	Non-Discrimination and Harassment-Free Workplace
	22	Respect for Workers' Rights
	23	Safe and Healthy Workplace
	24	Promotion of Diversity, Equity, and Inclusion (DEI)
Living in Harmony with Society	25	Environmental Responsibility
	26	Contribution to Society
Whistleblowing System		