

CODE OF CORPORATE ETHICS

Introduction

We have plotted out the following CODE OF CORPORATE ETHICS covering 18 items with the purpose of driving forward the fair and transparent corporate management of the ULVAC Group (hereinafter, “ULVAC”). The CODE OF CORPORATE ETHICS is intended to propel ULVAC’s development and growth into the future and shall serve as a measure of progress of both the members of the board and the employees of ULVAC through complete promotion and implementation of the concept of corporate ethics in the course of compliance with the code.

The CODE OF CORPORATE ETHICS is a guideline to ask questions of ourselves, such as whether implementation of our own business operations has worked for our customers, whether it has been right in light of the law and social ethics, and whether or not it has violated any human rights.

On Business Activities

1. Excellent Products, Services, and Safety

The basis of ULVAC’s raison d’être is whether the value of our products and services meets social needs. We take extra effort to upgrade our capacity for technological development and manufacturing know-how, pursuing the creation of a unique and original value system in order to consolidate this basis. We will work tirelessly to upgrade and enhance both the quality and safety of our products and services in order to prevent hazards to human life, body, or property assets.

2. Sound Corporate Association with Business Partners and Affiliated Companies

ULVAC will consistently and strictly warn our own members of the board and employees against favoring a specific party for unfair and unjust profit or benefit in business transactions both inside and outside of our group. Our members of the board and employees must behave with good judgment within reasonable bounds to avoid misunderstandings by society that may damage the reputation of the company.

3. Promotion of Maintenance of Fair and Free Competition

ULVAC’s business operations will conform to antitrust law to the effect of materializing fair trade leading to consumer protection and healthy development of Japan’s economy as well as overseas. In particular, we will not act in a cartel behavior (including collusive bidding or bid-rigging for one) that constrains prices and sales among business competitors.

Moreover, ULVAC personnel will conduct business operations in compliance with the subcontract law that prevents unfair and fraudulent trade by abusing a dominant bargaining position.

4. Protection of Intellectual Property Rights

ULVAC will make utmost efforts to create and protect information with regard to intellectual property rights and respect the justified intellectual property rights of third party, recognizing that intellectual property is an important management resource to support the company.

The intellectual property rights herein widely cover industrial property rights stipulated as rights under the law (patents, minor patents, industrial new design, brand, and trademark), and copyrights (art work or computer software, etc.), but also include and trade secrets stipulated under the Act against Unfair Competition.

5. Corporate Secrets

ULVAC will act to protect corporate secrets from inappropriate disclosure which may damage corporate interests and credibility. Corporate secrets herein shall include secrets of ULVAC and also third parties such as customers. Such corporate secrets are not limited to written documents and include electronic media, or goods and also other items of information that are orally communicated. This wide range of information will be categorized and made clear to third parties.

6. Client Information

ULVAC will strictly observe the confidentiality of secret information and data related to clients, customers, partners, and associates acquired through business. Further, we will never engage in activities that abuse or illicitly use or disclose the information for purposes other than the initial intention without the consent of the party concerned.

On Company-Employee Relations

7. Respect for Employee's Personality and Individuality

Based on the respect for personality and the individuality of each of our employees, ULVAC will make an effort to upgrade and maintain the personnel system, labor conditions, and the fluid system wherein workers may achieve affluence and a sense of accomplishment. Also, we will evaluate personnel objectively and fairly, fostering creative human resources with expertise and rich individuality at the same time.

8. Respect for Privacy

Respecting each employee's privacy, ULVAC will exercise prudence, taking a meticulous approach with due attention to handling individual information, making every effort to manage such information properly.

9. Respect for Human Rights and Nondiscriminatory Treatment

ULVAC will assure a healthy work environment where both harassment and discrimination are never acceptable for reasons of race, credo, complexion, sex, religion, nationality, language, bodily features and description, handicap or not, property or not, location or birthplace and sexuality. Also ULVAC will take no involvement in forced labor and child labor. ULVAC will especially strive to prevent sexual harassment, coercion, abuse, or harassing behavior by taking advantage of administrative authority and job function (harassment through official authority). In the event of such a problem, we will immediately and promptly start an investigation to take resolute action for relief of the victim and prevention of a recurrence.

10. Assurance of Safe and Healthy Work Environment

ULVAC will give top priority to assuring the safety, security, and health of employees, a positive and lively workplace throughout all the processes from usage to disposal of production equipment, parts, components, and materials, as well as all phases of our business operations. For this purpose, we will comply with all related laws, ordinances, and in-house rules and regulations.

On Company-Society Relations

11. Compliance with Laws or Ordinances

ULVAC will engage in business operations based on laws or ordinances, social norms, and common sense and decency. In particular, we will sincerely deal with observance humbly accepting the fact that corporate compliance with each issues of following law or ordinances is expected by society.

① Law on Trade

ULVAC will abide by Export Trade Control Ordinance, Foreign Exchange Law, Customs Law, Customs Tariff Law, and Export and Import Transaction Law. ULVAC will establish a system to perform trade

related services correctly and abide by the Security Export Control Rules and the Compliance Rules of Trade related service.

② **Financial Instruments and Exchange Act**

ULVAC will perform corporate activities not to distort the investment decisions of investors. ULVAC will establish a management system including internal corporate rules specifically to prevent unfair investment acts as insider trading.

③ **Political Funds Control Law and Public Offices Election Law**

ULVAC will abide by the Political Funds Control Law and the Public Offices Election Law, assuring plain and fair political associations as a business enterprise.

④ **Anti-bribery Statutes**

ULVAC will act for fair corporate activities and will never engage in illegal payoffs for transactions in both Japan or overseas.

⑤ **Law on Health and safety**

With the cooperation of all employees, ULVAC will perform health and safety activity through risk assessment and will ensure compliance to the occupational safety and health-related laws and ULVAC occupational health and safety relevant provisions. ULVAC will provide safe products and services to users implementing product risk assessment and ensure compliance to various safety standards.

12. Insulation from Antisocial Forces

ULVAC will never associate with individuals or groups exerting negative repercussions on social order and healthy corporate activities. In particular, our management personnel will certainly deal with such a force in a resolute manner. Adhering to our Negative Threes of Not To Fear, Not To Furnish Money, and Not To Use Service as a general rule, we will systematically contend against violence by intervenient stepping into civil affairs while seeking assistance from the police and attorneys without isolating individual employees in trouble.

13. Disclosure of Information

ULVAC will engage in fair and transparent business activities by disclosing essential information to clients, customers, business partners, employees, stockholders, investors, and local communities all related to ULVAC, depending on where one stands through proper steps, excluding corporate secrets and confidential information. We believe that constantly maintaining communication with society through appropriate information disclosure will ensure compliance with social ethics.

14. Global Environmental Protection

ULVAC has engaged in business operations that reaped benefits from the earth's natural resources and energy. For that reason, we share an awareness that protecting the global environmental is our responsibility, so we place environmental protection as one of our most important managerial agendas. In line with this concept, we will endeavor to prevent our business operations and the products and services we provide from creating a load on the earth's environment, not to mention observance of the laws or ordinances related to the environment. Specifically, ULVAC will attempt to thoroughly implement energy-saving policies, reduce and recycle waste material, and develop technologies and products useful for global environmental protection.

15. Local Contribution

ULVAC will promote and facilitate close collaboration, coordination, and maintain good terms with our local community. We have been proactively and aggressively interacting with our local community on a routine basis and will do so continually, ready to engage in emergency rescue operations and disaster-prevention activities without hesitation.

16. Global Business Activities

In order to smoothly develop overseas business enterprises in the midst of economic globalization and the trend toward a borderless economy, it is very important for ULVAC to respect local practices, customs, and culture and contribute to local development and growth, as well as compliance with international rules, laws and ordinances in various regions, and the laws in Japan. Accordingly, comprehending the various rules, laws, and ordinances, paying sufficient attention to the local practices, customs, and culture, the ULVAC will endeavor to develop and foster local industries by establishing closer mutual collaborative relations with local industries through local procurement of materials, parts, and components and through active technical guidance, assistance, and technological transfers.

17. Thorough Implementation of Corporate Ethics

Recognizing that complete corporate ethics lie within the responsibility of the corporation as a business enterprise, ULVAC will arrange and strengthen our compliance system for integration into the ULVAC. In order to maintain an environment where our members of the board and each of our employees can knowingly comply with the corporate ethics on continuing basis, we are setting up the standing Compliance Committee that drives forward compliance activities for our entire group and simultaneously facilitates improvements in our internal reporting system by establishing a set of compliance-related in-house rules and regulations.

On Board Members and Employees

18. Pronouncements by Individuals

I, as an individual member of the board or employee of ULVAC, Inc., and at the same time a member of the society, herein declare my awareness and intent to constantly focus on the developments of society, uplift my own sense of ethics and moral values, and to endeavor to control both the façade and matrix of my conduct and behavior with sound judgment.

In the Event of Wavering in Making a Decision

- Upon encountering a difficult situation in making a decision, you can ask yourself:
 1. Consider reevaluating the problem from another's perspective?
 2. Can it be justified from the viewpoint of legality and social ethics?
 3. Does it not violate another's human rights?
- If you're still at a loss for the right decision or still have doubts about your own decision, our advice for you is to consult with your immediate supervisor right away or visit our Internal Auditing Office.

Internal Whistleblowing Contact, ULVAC, Inc.

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※ We will certainly respect your privacy. Additionally, you will never be put at a disadvantage due to the consultation you have sought.