

ULVAC Group Corporate Code of Ethics

Introduction

Basic Corporate Philosophy :

“ULVAC Group aims to contribute to the development of industries and science by comprehensively utilizing its vacuum and peripheral technologies through the mutual cooperation and collaboration of the Group companies”.

All officers and employees of the ULVAC Group (hereinafter collectively referred to as “we”, “our” or “us”) share this basic corporate philosophy. In a free, open-minded, and collaborative work environment, we strive to continuously create value across the economic, social, and environmental dimensions.

We must fully understand and respond to the challenges and expectations of all our stakeholders (i.e., interested parties that directly or indirectly influence our business and are influenced by it, including customers, suppliers, shareholders and investors, officers and employees, local communities, government agencies, and financial institutions).

The “ULVAC Group Corporate Code of Ethics” (hereinafter referred to as the “Code of Ethics”) encourages us to consistently reflect on whether our business and individual responsibilities truly create value for our stakeholders. It serves as a guideline for our daily work that we must uphold and put into practice.

Each of us is committed to complying with laws and regulations (including ministerial ordinances and applicable foreign laws), as well as internal policies and standards (hereinafter collectively referred to as “Laws and Regulations”). We conduct all our business activities with high ethical standards.

As members of the ULVAC Group, we act with pride and a sense of responsibility and strive to create value through mutual cooperation.

Research and Development, Products, and Services

1) Safe and High-Quality Products and Services

We comply with applicable Laws and Regulations and technical standards. To meet customer requirements, we properly operate our management systems and deliver products and services with high quality and safety.

2) Creative Product Development and Technological Innovation

We pursue the development of innovative technologies, products, and services by using the unique technological assets of the ULVAC Group and by using our creativity and co-creations with external parties to the maximum extent possible.

3) Ethical Research and Development

We have high ethical standards on research and development (R&D), which are the source of the ULVAC Group’s value, and conduct R&D activities appropriately and efficiently. We understand that even advanced technologies may have adverse impacts on people and society depending on how they are used or applied, and ensure that our R&D are conducted ethically.

Ethical Conduct

1) Compliance with Laws and Regulations and Respect for International Norms of Behavior

We uphold the highest ethical standards in all aspects of our business activities and comply with applicable Laws and Regulations. In light of the ULVAC Group’s global business operations, we respect

and respect applicable international norms of behavior.

2) Appropriate Accounting Practices and Tax Payment

We conduct proper accounting practices in accordance with Laws, Regulations, and generally accepted accounting principles. We record and report financial information accurately and appropriately. In addition, we ensure compliance with tax-related Laws and Regulations. As one of corporate citizens, we fully understand the importance of properly fulfilling our tax obligations and carry out all related operations properly.

3) Appropriate Import and Export Control

We develop and maintain appropriate import and export control systems. When importing or exporting products and technologies, we comply with applicable import and export-related Laws and Regulations.

4) Fair Trade and Competition

We adhere to Laws and Regulations on fair competition, conduct fair business transactions, and engage in fair competition. We do not engage in price-fixing, collusion, or any other conduct that violates Laws and Regulations, or participate in discussions that could give rise to such concerns.

5) Prevention of Bribery and Corruption

We ensure compliance with applicable Laws and Regulations. We prohibit any and all corruptions (including suspected corruptions), including provision or offering of improper money or benefits, and conduct our business with transparency and integrity.

6) Prohibition of Conflicts of Interest

We refrain from engaging in any actions that give rise to conflict of interest or potential conflict of interest between the ULVAC Group and related parties, including ourselves, our relatives, or acquaintances. We clarify appropriate procedures to prevent such concerns from arising, communicate them internally, and ensure their proper implementation.

7) Prohibition of Insider Trading

We comply with applicable Laws and Regulations and refrain from using insider information (i.e., material non-public information) related to the ULVAC Group, its suppliers, or other parties for the purchase or sale of securities, including the stocks of the ULVAC Group or any other company. We also do not disclose or leak insider information to acquaintances, family members, or employees except for employees who are deemed as employees who need to know such information for their work.

8) Prohibition of Money Laundering

We adhere to all applicable Laws and Regulations concerning the prevention of money laundering (i.e., concealment of origin or real owner of criminal proceeds in order to avoid detection or prosecution by law enforcement agencies, etc.), and conduct proper management to prevent money laundering.

9) No Relationship with Anti-Social Forces

We do not have any relationship with anti-social forces (including not only organizations, but also individuals who are members of such organizations). We do not receive any proceeds involving criminal activities under any circumstances. In particular, our executives firmly respond to such anti-social forces without fear.

10) Responsible Procurement Practices

In line with our procurement-related policies, we conduct ethical and responsible procurement in all

applicable transactions, including the prevention of abuse of a dominant position, and build and maintain sound and cooperative relationships with suppliers.

Proper Handling of Information

1) Proper Handling of Information

We properly record and manage information related to our business activities, in compliance with applicable Laws and Regulations and standards (including accounting standards), without falsifying such information.

2) Ensuring Information Security

We develop and operate appropriate information security systems and ensure that all information related to our business activities is properly managed. Regarding confidential information, we strictly comply with internal policies designed to prevent information leakage, establish and maintain reasonable and appropriate information management systems, and continuously enhance such systems. We do not misuse confidential information of third parties or obtain it through improper means.

3) Timely and Appropriate Disclosure of Information

We conduct our business activities in a fair and transparent manner by complying with applicable Laws and Regulations concerning information disclosure and by disclosing information, which the ULVAC Group considers as valuable, to stakeholders—including customers, suppliers, officers and employees, shareholders, local communities, and investors—in a timely and appropriate manner, excluding trade secrets and other confidential information.

4) Protection of Intellectual Property

We adhere to applicable intellectual property Laws and Regulations. We respect the intellectual property rights of others, protect the confidential information of customers and suppliers, and refrain from any activities that infringe upon the rights of third parties. We appropriately acquire rights in our Intellectual properties and strive to enhance the value of the company by using such rights. At the same time, we do not unjustly abuse our rights in a way that impedes the sound development of society.

5) Respect for Privacy and Protection of Personal Information

We respect the privacy of every individual and treat personal information with the utmost care. We comply with applicable Laws and Regulations, properly collect, record, use, and destroy personal information to the minimum extent necessary for business purposes, and protect such information from loss, falsification, and leakage.

6) Appropriate Communication of Information

We do not disseminate any information that harms or potentially harms the dignity of the ULVAC Group, such as disclosing confidential or personal information obtained in the course of work, making defamatory or discriminatory remarks about others, or disseminating false information, through any forms of communication, including social media, e-mail, or oral communication, both during and outside of work.

Enhancement of Human Capital and Respect for Human Rights

1) Respect for Human Rights

We understand that every individual is irreplaceable and respect the human rights of all people involved in our business activities, including officers, employees, customers, suppliers, and local residents. We

comply with applicable Laws and Regulations and uphold international norms of behavior on business and human rights. In line with these standards, we strive to prevent human rights violations arising from our business activities. Should any adverse impacts on human rights occur, we will take appropriate measures.

2) Non-Discrimination and Harassment-Free Workplace

We do not tolerate any form of discrimination based on race, color, age, gender, political beliefs, sexual orientation, gender identity or expression, ethnic or national origin, disability status, pregnancy, religion, place of origin, social origin, partnership status, or any other grounds. Furthermore, we strictly prohibit all forms of harassment and do not engage in such behavior.

3) Respect for Workers' Rights

We respect the right to freely form, join, or leave labor unions, and to participate in collective bargaining and peace rally. We ensure opportunities and environment where employees and others can engage in dialogue with the company regarding working conditions and management practices without fear of discrimination, retaliation, intimidation, harassment, and other similar conduct. In addition, we do not tolerate forced labor or child labor under any circumstances.

4) Safe and Healthy Workplace

We recognize that the safety of our officers, employees, and other personnel is our top priority in all business activities. We comply with applicable Laws and Regulations, meet customer requirements, operate our management systems appropriately, and maintain safe and healthy workplace and working environment for all people working at ULVAC Group. We remain prepared for emergencies, including disasters, and work together as one to ensure everyone's safety in case that such emergencies occur.

5) Promotion of Diversity, Equity, and Inclusion (DEI)

We respect the character and individuality of each person and mutually recognize the diverse values they bring. We strive to create a diverse, fair, inclusive, and collaborative workplace where we can feel a sense of belonging and are empowered to reach their full potential.

Living in Harmony with Society

1) Environmental Responsibility

We understand that the conservation of the global environment is a critical issue for all mankind. We comply with applicable Laws and Regulations, meet customer requirements, and operate our management systems appropriately, with the goal of promoting a sustainable society. We continue to strive to prevent environmental pollution and reduce environmental impact.

2) Contribution to Society

To live in harmony with local communities, we actively contribute to society by leveraging our technologies and human resources.

Whistleblowing System

The ULVAC Group is committed to complying with this Code of Ethics in order to remain a socially beneficial and ethical organization. We strive to appropriately address the issue of actual or suspected violations of this Code of Ethics or Laws and Regulations by establishing and operating a whistleblowing system which enables reporting of such actual or suspected violations.

This system includes the following guidelines:

- Active reporting of any misconduct seen or heard is encouraged.
- Misconduct may be reported either under the whistleblower's name or anonymously. The anonymity and privacy of whistleblowers are protected.
- Retaliation or harassment against whistleblower is strictly prohibited. Whistleblower will not become subject to any unfair treatment.

Whistleblower Help Desk:

● Internal Whistleblower Help Desk, ULVAC, Inc.

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