

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”) 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, defined as 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 the highest 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 ensure compliance with applicable laws, regulations, and technical standards. To meet customer requirements, we properly operate our management systems and deliver products and services of high quality and safety.

2) Creative Product Development and Technological Innovation

We leverage the unique technological assets of the ULVAC Group and make the most of our creativity and co-creation with external parties, thereby pursuing the development of innovative technologies, products, and services.

3) Ethical Research and Development

Research and Development (R&D) is the source of the ULVAC Group’s value. We conduct appropriate and efficient R&D activities with the highest ethical standards. Recognizing that even advanced technologies may have adverse impacts on people and society depending on their application, we ensure that our R&D is conducted ethically.

Ethical Conduct

1) Compliance with Laws and Regulations and Respect for International Norm 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 comply with applicable international norm 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 a responsible corporate citizen, we fully recognize 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 laws and regulations.

4) Fair Trade and Competition

We adhere to laws and regulations governing fair competition and conduct fair business transactions and competition. We do not engage in price-fixing, collusion, or any conduct that violates laws and regulations, nor 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 strictly prohibit bribery or any corrupt acts, including suspicious behavior and the provision or offering of improper money or benefits, thereby conducting our business with transparency and integrity.

6) Prohibition of Conflicts of Interest

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

7) Prohibition of Insider Trading

We comply with applicable laws and regulations and do not use Insider Information (Material Non-Public Information) related to the ULVAC Group, its suppliers, or other parties. This includes refraining from using such information for the purchase or sale of securities, including the stocks of the ULVAC Group or any other company. Additionally, we do not disclose or leak Insider Information to acquaintances, family members, or employees who do not have a legitimate business need to know.

8) Prohibition of Money Laundering

We adhere to all applicable laws and regulations concerning the prevention of money laundering. Money laundering involves concealing the origin or true ownership of criminal proceeds to avoid detection or prosecution by law enforcement agencies. We ensure proper management to prevent money laundering in advance.

9) Strict Non-Association with Anti-Social Forces

We strictly avoid any association with anti-social forces, including both organizations and the individuals who constitute them. We do not receive any proceeds from criminal activities under any circumstances. Particularly, executives must respond to such forces without fear and with a firm and resolute stance.

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. We build and maintain sound and cooperative relationships with suppliers.

Appropriate Management of Information

1) Proper Handling of Information

We appropriately record and manage information related to our business activities, in compliance with applicable laws, regulations, and standards, including accounting standards. We ensure that this information is never falsified.

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. We establish and maintain effective and appropriate information management systems and continuously strive to enhance them. We do not misuse confidential information of third parties, nor obtain it through improper means.

3) Timely and Appropriate Disclosure of Information

We comply with applicable laws and regulations concerning information disclosure. We disclose information that the ULVAC Group considers valuable to stakeholders—including customers, suppliers, officers and employees, shareholders, local communities, and investors—in a timely and appropriate manner. This excludes trade secrets and other confidential information. By doing so, we conduct our business activities in a fair and transparent manner.

4) Protection of Intellectual Property

We adhere to applicable intellectual property laws and regulations. We respect the intellectual property rights of others and protect the confidential information of customers and suppliers, refraining from any activities that infringe upon the rights of third parties. Intellectual property rights are safeguarded appropriately and leveraged to enhance the value of the company. Additionally, we exercise our rights in a way that avoids unjustly impeding 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 and handle personal information only to the extent strictly necessary for business purposes, ensuring that it is collected, recorded, used, and disposed of properly. Personal information is also safeguarded against loss, alteration, or leakage.

6) Appropriate Communication of Information

We do not, by any means of communication—including social media, email, or oral conversations—and either inside or outside the company, disclose confidential or personal information obtained in the course of our work, or disseminate any others' defamatory or discriminatory remarks, or false information that harm or potentially harm the dignity of the ULVAC Group.

Enhancement of Human Capital and Respect for Human Rights

1) Respect for Human Rights

We recognize the inherent value of every individual and respect the human rights of all people involved in our business activities, including officers, employees, customers, suppliers, and residents of local communities. We comply with applicable laws and regulations and uphold international norm 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 to address them.

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 rights to freely form, join, or leave trade unions, bargain collectively, and engage in peaceful assembly. We ensure opportunities and an 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 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 a safe and healthy workplace and working environment for all ULVAC Group employees. We remain prepared for emergencies, including disasters, and unite in such events to safeguard everyone's safety.

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 all employees 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 humanity. 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 continuously 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 comply with this Code of Ethics to remain a socially beneficial and ethical organization. In accordance with relevant laws and regulations, we establish and operate a system for reporting actual or suspected violations of this Code of Ethics or laws and regulations. We strive to address such issues appropriately.

This system includes the following guidelines:

- Active reporting of any witnessed or heard misconduct is encouraged.
- Misconduct may be reported either under the reporter's name or anonymously. The anonymity and privacy of reporters are protected.
- Retaliation or harassment against reporters is strictly prohibited, and they do not suffer any unfair treatment.

Whistleblowing Contacts:

- Internal Whistleblowing Contact, ULVAC, Inc.

Phone: +81-(0)467-89-2020

E-mail: naibu_tsuho@ulvac.com

Address: 2500 Hagisono, Chigasaki City, Kanagawa Prefecture, JAPAN
253-8543

Or

- External Whistleblowing Contact (E-Mail only)

E-mail: ulvac_gaibutsuho@fujigodo.co.jp