

Compliance

The Tokyo Electron Group conducts fair and trustworthy business activities in strict compliance with corporate ethics, laws, and regulations.

Approach to Corporate Ethics and Legal Compliance

Trust is and will always be the lifeline of the Tokyo Electron Group. The fundamental requirements for maintaining trust are rigorous conformity to our ethical standards and compliance with the law, by our employees as individuals, and by each of our organizations. We give first priority to compliance with high ethical standards and laws in conducting our business operations.

Establishing Ethical Standards

We believe that common standards must be applied throughout our divisions in order to create the globally excellent company that we envision. In 1998 we established a Code of Ethics, which concretely describes our basic views. At the same time,

The Code of Ethics of Tokyo Electron Group
Introduction

I. Principles

1. Compliance with Applicable Laws
2. Acting in Accordance with Social Conscience
3. Maintaining Harmonious Relationships with Local Communities

II. Honest and Fair Business Activities

II-1 Technology, safety, and the Environment

4. Ensuring Safety and Pursuing Quality
5. Promoting Environmental Preservation Activities
6. Ethics in Manufacturing

II-2 Fair Trade

7. Implementing Fair and Open Competition
8. Fair Business with Suppliers
9. Handling of Confidential Information
10. Strict Export/Import Controls
11. Reasonable Exchanges of Gifts and Entertainment within the Bounds for Common Sense

II-3 Relationship between the Company and Individuals

12. Prohibition of Conduct Causing Conflicts of Interests
13. Prohibition of the Improper Use of Company Assets
14. Prohibition of Conduct of Harassment

III. Being a Good Corporate Citizen

15. Prohibition of Insider Trading
16. Prohibition of Political Activities and Contributions
17. Prohibition of Involvement in Antisocial Forces
18. Respect for Individuals

Implementation of the Code of Ethics*

* The "Implementation" section provides the specific matters and procedures.

we established the Ethics Committee as an organization for actual operations.

In June 2007, in response to the results of a survey conducted on our Code of Ethics and compliance measures in the Group in 2005, we revised our Code of Ethics, including adding items and modifying expressions, to make them easier to understand and more consistent with the current business environment and sense of ethics.

Measures to Strengthen the Compliance System

We established our Compliance Regulations in 2004. The Regulations, which provide for basic matters concerning compliance, are designed to help those engaged in the business operations of the Tokyo Electron Group understand fully the relevant laws, regulations, and international rules as well as in-house rules and act accordingly at all times.

In 2006, we provided all employees in Japan with web-based training on export compliance. Due to the tense international situations, controls on exports from Japan have been strengthened and it is becoming very important for all the departments, including both the sales and service departments who directly contact overseas customers, and those indirectly involved in export to understand the basic export rules.

We provide compliance-related information on the intranet and give employees web-based education to ensure that they all understand our compliance policies and are more aware of their importance, thereby further strengthening our compliance system.

Protection of Personal Information

Leakage of personal information has become a social concern in recent years and companies are required to manage the personal information they hold in an appropriate manner.

In Japan following the enactment of the Act on the Protection of Personal Information in April 2005, the Tokyo Electron Group formulated its basic policies and rules on the protection of personal information. We educate employees on the implementation of the policies and rules, endeavoring to make them more aware of these policies and rules. Furthermore in Japan, we investigated personal information stored on approximately 13,000 PCs leased to employees and created a ledger of personal information to be managed by each Group company and department. Also, we installed servers to be used exclusively for storing personal information and prohibited employees from storing important personal information on their PCs. Through these measures, we ensure that personal information is managed in an appropriate way.