



## **UK Modern Slavery Act 2015 Transparency Statement**

### **Introduction from the Representative Director, President and Managing Director**

As a responsible manufacturing and supply business operating in the global business community, the Tokyo Electron Group (the Group) recognizes the risk of unintentionally being involved in human rights exploitation and is committed to collaborating with its supply chains to combat human rights abuses such as modern slavery and human trafficking. This commitment is recognized in the Group's corporate philosophy which defines its mission in society as *"we strive to contribute to the development of a dream-inspiring society through our leading-edge technologies and reliable service and support"*.

To respond to the increasing global concerns of, amongst other things, modern slavery, human trafficking and human rights, the Group has assigned the dedicated function to promote sustainability to lead this important initiative throughout the Group. As the guiding principle of sustainability, the Group has incorporated universal guidelines and standards, including the United Nations Global Compact and an industry standard, Responsible Business Alliance (RBA) Code of Conduct, into the Group's strategies, policies and procedures, and has established and continues to cultivate a culture of integrity.

### **Organisation's structure and business<sup>1</sup>**

Tokyo Electron Limited is a global manufacturer of semiconductor production equipment and flat panel display production equipment in the technology sector and has its head office in Japan. It is the parent company of the Group which has 19,573<sup>2</sup> employees worldwide and operates in 18 countries.

Tokyo Electron Europe Limited is a subsidiary of Tokyo Electron Limited and engages in sales and services in a wide range of high-technology fields in Europe. Tokyo Electron Europe Limited, located in the United Kingdom, is the headquarters of our European operation, comprising, 744<sup>3</sup> employees in 4 companies across 9 countries.

The Group has a global annual turnover of 2,431,568 million Japanese Yen.

### **Our supply chains**

Our main direct suppliers are manufacturers of components and parts for semiconductor production equipment, as well as labour service providers for supporting such equipment. Among the Group-wide supply chains, the majority of our suppliers by spend are located in Japan.

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<sup>1</sup> This statement is made on behalf of Tokyo Electron Limited and its subsidiary Tokyo Electron Europe Limited, which are both required to make a statement pursuant to s54 of the Modern Slavery Act.

<sup>2</sup> As of 31 March 2025

<sup>3</sup> As of 31 March 2025



The Group is committed to partner with its people and supply chains to create an environment where workers' human rights are fully respected in each location in which it operates.

### **Our policies on anti-modern slavery and human trafficking**

The Group has established [Tokyo Electron Group Human Rights Policy](#) referring to the United Nations' Guiding Principles on Business and Human Rights and the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work referred to therein, the Ten Principles of the United Nations Global Compact, and the RBA Code of Conduct. We have firmly upheld human rights since our founding as reflected in the spirit of "the Corporate Philosophy" and "the Management Policies" of the Group. Key human rights issues are also addressed in the Group's Code of Ethics and Procurement Policy, which covers the Group's entire operations and direct supply chains.

We incorporate the concept of respect into every aspect of our business activities, and strive for the creation of a corporate culture that enables each person to realize his or her full potential and freely enjoy their livelihoods. We also give the highest consideration to the health and safety of every person and respect his or her dignity.

For us, respecting human rights means a significant understanding not only to fulfil our responsibility for eliminating modern slavery and other adverse impacts on people through business activities, but also those who support our business activities, and contribute to the realization of a sustainable dream-inspiring society.

In recent years there has been an emerging concern in the electronics industry for better treatment of workers in supply chains, we therefore publicly announced our membership of the RBA in June 2015 and our commitment that the Group would conform to the RBA Code of Conduct. In line with this we are committed to pursue socially responsible practices in line with global standards and to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business with a continuous improvement approach.

### **Due diligence processes for slavery and human trafficking**

We have zero tolerance to slavery and human trafficking. As part of our initiative to identify and mitigate slavery and human trafficking risk the Group has worked to establish a robust due diligence system throughout the organization.

Key steps we have taken as of the fiscal year ending 31 March 2025 are as follows:

- We continue to assess our conformity with the RBA Code of Conduct. This is conducted by way of a sustainability assessment in the areas of labour and employment practices, health and safety, ethics, the protection of the environment, and management systems. This has been extended to cover human resources, logistics, customs and facility service suppliers in addition to our materials suppliers.
- We investigated our suppliers to mitigate risks associated with forced labour and debt labour in our supply chain. Our suppliers worked with us to take the corrective actions that we had identified. With the understanding and cooperation of our suppliers, we continue to combat modern slavery in our supply chain.
- In 2024, continuing from the previous year, we also investigated our Group companies to identify whether there are internal risks of breaching human rights. Our investigation

included distribution of a unified survey to each Group company. The survey contained the same questions and indicators as the survey we ask our suppliers to complete. Following review of the responses, we provided feedback to each group company, and requested corrective actions where required to further reduce any internal risks related to breach of human rights. Following on from the previous fiscal year, we also visited at the site of overseas Group company to confirm the actual situation and discuss the effectiveness of corrective actions taken.

- We have revised the content of the questionnaire, adding new human rights questions in line with the United Nations Guiding Principles on Business and Human Rights.
- We have published “Tokyo Electron Group Code of Ethics” as a code of conduct for all executives and employees and to ensure awareness of our Code of Ethics, we have translated it into 6 languages. Our Code of Ethics includes a statement to secure human rights and commit to ensuring human rights and not discriminating or supporting forced labour, debt labour, child labour, or any other form of modern slavery. We conduct mandatory annual training on the Code of Ethics and collect acknowledgements of compliance from executives and employees, aiming to achieve a pledge rate of 100%.

We have established an internal reporting system that is also accessible to our suppliers, “TEL Group Ethics & Compliance Hotline” as a global common internal point of contact that uses a third-party system, and to maintain confidentiality and anonymity. This hotline can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees. Also, we provide an external point of contact at a law firm that can be contacted directly. We responded to all reports we received through these points of contact, conducted investigations in accordance with internal rules to implement corrective measures as well as preventive measures. We do not tolerate retaliation against those who report ethics and compliance concerns in good faith, ensuring no one is permitted to engage in retaliation, or any form of retaliatory behaviours, against another for reporting ethics and compliance concerns. We promote enhancement of the reporting system. Breakdown of Consultation/Report Contents is disclosed in [our integrated report 2024](#).

- We proactively continued activities of our human rights project team with representatives from our compliance, human resources, procurement, logistics, facility service and sustainability departments. The team has focused on conducting the sustainability assessment, evaluation and analysis of assessment results. With the process established, the team promotes and supports established corrective actions by each Group company as well as our suppliers and requested them for their cooperation for corrective actions to mitigate the risk in our supply chain.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide human rights training to all our employees.

## **Our effectiveness in combating slavery and human trafficking**

Our Group’s major sites are currently rated as low risk and we will continue to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:



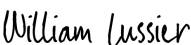
## Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Strengthen the structure and activities of human rights projects to deepen our due diligence process.
- Using the new questionnaire, continue to assess and monitor the risks in our supply chain.
- We will add more Group companies bases to be surveyed and conduct a broader range of human rights risk investigation.
- Implement corrective actions in our supply chain to mitigate risks based on evaluation and analysis of the sustainability assessment results.
- We are actively working to evaluate the effectiveness of corrective actions. If there is a problem with effectiveness, the corrective measures themselves will be reviewed.
- We will promote enhanced disclosure in our integrated report and on our website.
- We will also create new e-learning materials on business and human rights and work to raise employee awareness of human rights.
- Additionally, we will further improve our grievance mechanisms and make it more effective so that we can quickly and appropriately deal with negative impacts on human rights.
- Pursuit of transparency and enhancement of disclosed information.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2025.

This statement has been unanimously approved by the board of directors of Tokyo Electron Europe Limited.

Signed by:  
  
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Tokyo Electron Europe Limited

Date: 6/6/2025