

Tokyo Electron Group

Global Anti-Bribery and Anti-Corruption Policy

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About the Global Anti-Bribery and Anti-Corruption Policy

Purpose

As a global company, Tokyo Electron Limited and each of its subsidiaries (collectively, “TEL Group” or the “Company”) are dedicated to ensuring compliance with all applicable anti-bribery and corruption laws and regulations including the U.S. Foreign Corrupt Practices Act (the “FCPA”), the UK Bribery Act, the Japanese Unfair Competition Prevention Act, the India Prevention of Corruption Act 1988 and other applicable laws. The purpose of this Global Anti-Bribery and Anti-Corruption Policy (this “Policy”) is to assist TEL Group personnel with recognizing situations that may implicate anti-bribery and corruption laws. This Policy supplements the Code of Ethics.

Who Should Follow this Policy

This Policy shall apply to all the officers (including directors and company auditors), Corporate Officers and Executive Officers of TEL Group, persons who have entered into employment/are engaged with and are rendering services to any entity in TEL Group (irrespective of employment status, such as regular employees, contract employees, advisers, consultants, independent contractors, fixed-term employees, employees rehired after mandatory retirement, part-time employees, and workers hired on a daily or seasonal basis), and other persons who perform work for the Company such as secondees and temporary workers from another entity or agency (collectively the “Officers and Employees”).

Obligation to Report and Cooperate with Investigations

In the event that any Officer or Employee becomes aware of any actual or possible bribery, illegal accounting practice or violation of this Policy (including cases in which a third party engaged by the Company is suspected to have engaged in bribery), he/she must promptly report the same to his/her supervisor or the Legal and Compliance Department (or your Region Compliance contact). The Company will not tolerate retaliation against those who use available channels in good faith to seek assistance, make complaints or reports, or assist or participate in any manner in any internal investigation or other proceeding whether internal, or conducted by or on behalf of a governmental enforcement agency.

No employee is permitted to engage in retaliation, or any form of retaliatory behaviors, against another employee for reporting bribery concerns in good faith or cooperating with an investigation. If you feel you are being retaliated against, please immediately contact any of the channels available to you. Retaliation or any form of retaliatory behavior is grounds for disciplinary action.

Employees will not be treated unfairly even if their complaints are proven unfounded by an investigation, unless the employee knowingly made a false allegation or otherwise acted in bad faith. Any person who is found to have engaged in retaliation is subject to disciplinary

action up to and including dismissal. Further, any Officer or Employee suspected of involvement in the reported violations must fully cooperate with the ensuing investigation.

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Bribery of Public Officials/Servants

Officers and Employees shall not, directly or indirectly (meaning through a third party), attempt to give or give, offer, promise or authorize the provision of money or any other benefit set out below ("Bribe") to a public official / servant ("Public Official") in connection with the duties of the Public Official or to obtain an undue advantage from the Public Official when conducting Company business worldwide. Be aware that the mere appearance of influencing a government official may be sufficient to trigger an allegation that bribery has been committed.

- **Public Official:** Officials and employees of a government or any person remunerated by the government by fees or commission for any public duty (including police officers, firefighters, members of the military, tax authorities, customs inspectors, election officials, an office bearer of corporations/institutions established or receiving fund from a government, university vice-chancellors/professors at public universities etc.), ministry or agency, local government, government-affiliated company or entity, public international organization (e.g., the United Nations, World Bank, International Red Cross, International Olympic Committee), judges (including persons empowered with adjudicatory functions), arbitrators, members of any service commission or political party, candidates for public office, and persons who perform official duties on their behalf.
- **Bribe:** Money (including the making of any "facilitating" payments) and anything else of value, including not only cash and cash equivalents but also the provision of gifts, travel, entertainment, discounts, training and employment, actions, omissions, favors, including offers of employment or internships, to government officials, their family members or associates; donations to a political party or charity affiliated with or sponsored by a government official, his or her family member or associates.
- **Gift:** provision of goods without anything in return regardless of value, including seasonal gifts (e.g., Christmas/New Year gifts) and courtesy gifts to show good will (e.g., souvenirs) which are prohibited under our company's internal rules or any applicable laws, except for inexpensive promotional items such as pens with our company logo.
- **Entertainment:** provision of meals (breakfast, lunch, and dinner) and invitation to entertainment events such as sports matches and music/show events which are prohibited under our company's policy or any applicable laws. Please note that in no event it is allowed to entertain Public Officials at inappropriate places for adult entertainment or gambling.

2

Commercial Bribery

When conducting Company business, Officers and Employees may not give or attempt to give, or offer, promise or authorize the payment of any bribe.

This includes directly or indirectly (meaning through a third party).

Such prohibited bribes include payments meant to induce the recipient to engage in conduct to that provides an advantage to the payee (such as granting a favor) with a corrupt intent.

3

Acceptance of Bribes

Officers and Employees of TEL Group may not directly or indirectly solicit, receive or accept Bribes. A Bribe from a supplier often takes the form of excessive hospitality or gifts.

4

Accounting Fraud

Officers and Employees must prepare and maintain accounting records that are reasonably detailed and accurate and that properly reflect the reality of all transactions and disposition of Company's assets when performing their duties.

5

Anti-Corruption Procedures

Officers and Employees must comply with the procedures set out in the Guidelines attached to this Policy and internal rules when engaging in the following acts in connection with the Company's business:

1. providing hospitality and gifts to or extending an invitation to a Public Official or non-Public Official;
2. providing donations (community, political, charity or otherwise);
3. engaging certain third parties; and
4. making certain investments.

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Committee for Achieving Global Compliance

- Tokyo Electron Limited ("TEL") shall determine anti-corruption compliance plans, periodically review, revise or abolish this Policy and continuously

promote global compliance by TEL Group.

- **TEL's Legal and Compliance Department shall, under the supervision of the Chief Compliance Officer, carry out risk assessments, periodic training, determine the treatment of consultations and investigations and support compliance with this Policy by each TEL Group company.**
- **TEL's Internal Audit Department ("Audit Center") shall audit the status of compliance with this Policy in accordance with the internal audit policy.**
- **A Regional Compliance Head or Compliance Manager for each TEL Group company shall be appointed by the Chief Compliance Officer of TEL to promote compliance with this Policy.**

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