

**Company Name** Tokyo Electron  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 15.0 out of 100

Theme Score	Out of	For Theme
3.1	10	A. Governance and Policies
2.5	25	B. Embedding Respect and Human Rights Due Diligence
4.5	20	C. Remedies and Grievance Mechanisms
1.9	25	D. Performance: Company Human Rights Practices
3.0	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states that 'We respect human rights of all directly hired individuals including contract workers, part-timers and agency workers ("employees") of Tokyo Electron Limited and its consolidated subsidiaries ("Tokyo Electron Group"); as well as employees of business partners of Tokyo Electron Group, especially those within our supply chain. Furthermore, we respect human rights of the customers who may be affected by safety of products and services manufactured and/or provided by Tokyo Electron Group'. [Human Rights Policy, 29/09/2017: <a href="http://tel.com">tel.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: The Code of Ethics indicates: 'TEL Group respects the human rights described in the UN Guiding Principles on Business and Human Rights'. The Human Rights Policy indicates: 'We have committed to respect human rights in line with the United Nations Guiding Principles on Business and Human Rights'. [The Code of Ethics, 01/05/2020: <a href="http://tel.com">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="http://tel.com">tel.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Code of Ethics indicates: 'TEL Group respects the human rights described in (...) the ILO Declaration on Fundamental Principles and Rights at Work'. [The Code of Ethics, 01/05/2020: <a href="http://tel.com">tel.com</a>]</li> <li>Met: Company has a explicit commitment to All four ILO Core: According to its Human Rights Policy, the Company is committed to each of 'Freedom, equality &amp; Non-Discrimination', 'freely chosen employment: We have zero tolerance for child</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>labor, forced labor, bonded labor and human trafficking'. Regarding 'Freedom of Association', it indicates: 'We create opportunities for open-minded dialogue with employees. We respect the right of employees to freely associate (form and join groups) and to voluntarily discuss and negotiate their relations with their employers as well as respect the right of the employees to refrain from such activities'. The Code of Ethics indicates: 'We are committed to fostering a workplace that is respectful, inclusive and safe by promoting human rights and diversity and complying with all laws and regulations pertaining to labor practices, freedom of association, collective bargaining'. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [The Code of Ethics, 01/05/2020: <a href="#">tel.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core: See description below</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The 2021 Sustainability Report indicates: 'To make its entire supply chain sound and sustainable, Tokyo Electron has formulated a procurement policy based on the laws, regulations and social norms of each country, as well as the RBA Code of Conduct, and is promoting activities based on this policy by disseminating it throughout the Company and its suppliers'. The Procurement Policy (website subsection 'CSR Related Policies') covers: child labor, and forced labor, prohibition of discrimination. However, it is not clear the Company expects suppliers to respect the rights to freedom of association and collective bargaining. No further evidence found. Although the Company requires suppliers to comply with the RBA code of conduct, requirements related to Freedom of Association and Collective bargaining are subject to local laws. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. Commitments are expected to be placed in Company policy documents. [CSR Related Policy, N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company indicates that 'Product Safety &amp; Workplace Health and Safety: We address health and safety through taking steps to ensure that our products and services do not threaten the life and health of the people who manufacture, provide or use them'. In addition, the specific safety policy expands requirements on health and safety. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The HR policy states that 'We respect the right of employees to live a healthy life. We conduct our business in compliance with all applicable laws and regulations relating to working hours, breaks, holidays and vacation days'. Moreover, the Code of Ethics states: 'TEL Group considers that the following human rights are particularly important: appropriate working hours &amp; breaks/holidays/vacations'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. The Company has provided an additional source to this indicator, however key information was already in use. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [The Code of Ethics, 01/05/2020: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Procurement Policy (website subsection 'CSR Related Policies') indicates: 'We request that management systems are developed and continuously improved, including systems related to safety, health (...) in accordance with the corporate procurement agreement or any specific agreements or arrangements with the TEL group'. In addition, suppliers are required to comply with the RBA code which includes requirements on health and safety. [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The 2021 Sustainability Report indicates: 'To make its entire supply chain sound and sustainable, Tokyo Electron has formulated a procurement policy based on the laws, regulations and social norms of each country, as well as the RBA Code of Conduct, and is promoting activities based on this policy by disseminating it throughout the Company and its suppliers'. In relation to working hours, the Code states requires the following: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. The Company has provided an additional source to this indicator, however key information was already in use. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a> ] & [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a> ]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing: The Code of Ethics indicates: 'We do not accept raw materials or materials that contain conflict minerals which have been obtained illegally by use of child labor or modern slavery, or through other abuses of human rights'. Moreover, the Procurement Policy states: 'We [...] promote all efforts to eliminate any use of raw materials that utilize conflict minerals which have been mined or extracted with illicit funds or by illegal methods, as well as components or parts that contain such conflict minerals'. [The Code of Ethics, 01/05/2020: <a href="#">tel.com</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Met: Based on OECD Guidance: The Procurement Policy, found on the webpage subsection, 'CSR Related Policies' indicates: 'we are conducting due diligence surveys of our supply chain, using the Conflict Minerals Reporting Template (CMRT) and referring to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'. [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: The Procurement policy covers suppliers. In addition, it requires suppliers to comply with RBA code. According to RBA Code of Conduct: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. [CSR Related Policy, N/A: <a href="#">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commits to follow OECD Guidance for all minerals</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights: In its Human Rights Policy and its Code of Ethics the Company states that it 'will not engage in or allow discrimination based on [...]gender [...] in hiring and employment practices such as posting, access to training, wages, rewards and promotions.' The 2021 Sustainability Report indicates: 'At Tokyo Electron, diversity and inclusion are management pillars that lead to the continuous generation of innovation and increased corporate value. We are actively pursuing them with the strong commitment of our management. Although the areas of emphasis for diversity and inclusion vary by country, we have taken on gender and nationality as major themes and put the goals and initiatives in place based on the characteristics of each region'. However, no evidence found of a commitment to respecting women's rights. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [The Code of Ethics, 01/05/2020: <a href="#">tel.com</a>]</li> <li>• Not Met: Children's rights [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [The Code of Ethics, 01/05/2020: <a href="#">tel.com</a>]</li> <li>• Not Met: Migrant worker's rights [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The 2021 Sustainability Report indicates: 'To make its entire supply chain sound and sustainable, Tokyo Electron has formulated a procurement policy based on the laws, regulations and social norms of each country, as well as the RBA Code of Conduct, and is promoting activities based on this policy by disseminating it throughout the Company and its suppliers'. The Code indicates that 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including (...) migrant'. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy: The Human Rights Policy indicates: 'We will build and operate a human rights impact assessment and remediation process framework. Through this framework, we will strive for the prevention, mitigation and remediation of, and avoidance of contributing to, adverse human rights impacts if they exist either directly or indirectly through our own activities and those activities associated with our business relationships'. However, 'will strive for' is not considered a formal commitment to remedy according to CHRB wording criteria. Regarding its Internal Reporting System, the 2021 Sustainability Report indicates: 'we have established an internal reporting system that ensures complete confidentiality, anonymity and the prohibition of retribution so that employees can safely and reassuringly provide information and seek redress outside the chain of command about behavior that is, or may be, in violation of laws, regulations or business ethics. [...] we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline-a global common internal point of contact that uses a third-party system that is also accessible to our suppliers-as well as an external point of contact that allows direct consultation with an outside law firm. The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. It also indicates that in 2019, 'we completely revised the content of the survey based on audit standards stipulated by the RBA and have since conducted surveys on materials, staffing and logistics suppliers'. However, no publicly available policy statement committing it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact: The 2021 Sustainability Report indicates: 'Tokyo Electron Kyushu is working with its suppliers on its own improvement activities'. However, no commitment found to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The 2021 Sustainability Report indicates: 'we implement sustainability management, integrating it with our business strategy from a medium- to long-term perspective of corporate value enhancement. [...] The CSR Management Council, the highest decision-making body regarding CSR conducts discussions regarding the policy for the entire group, and important projects'. Moreover, the Company indicates the CSR Management Council is composed by the Chairman of the Board; Representative Director, CEO and President and Corporate Directors and Managers. According to the webpage section Related Policy, 'Tokyo Electron(TEL) has set various CSR-related policies, based on which CSR programs are implemented at each department'. Among them is the Human Rights Policy. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO: The Company discloses its CEO Message, which states: 'In fiscal year 2017, we established three pillars of product competitiveness, responsiveness to customers, and higher productivity in our medium-term management plan, and identified two additional material issues: people and workplaces, which is important as a source for value creation, and management foundation, which relates to corporate governance, the environment, and human rights'. However, no further evidence available concerning speeches or letters by board members against Human Rights approach. No new relevant evidence found in latest revision. [Tokyo Electron Sustainability Report 2019, 18/11/2019: <a href="http://tel.com">tel.com</a>]</li> </ul>
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy: The 2021 Sustainability Report indicates: 'The CSR Management Council, the highest decision-making body regarding CSR conducts discussions regarding the policy for the entire group, and important projects'. The CSR Management Council meets twice a year. However, although the Company indicates the frequency of its meetings, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes. In its feedback to CHRB, the Company has made reference to the Ethics Committee, however, it is not clear it is a Board level committee and no further details of discussions found. This indicator looks for a description of the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The Company indicates: 'Compensation for inside Directors consists of fixed basic compensation, annual performance-linked compensation, and medium-term performance-linked compensation[...]. Medium-term performance-linked compensation is to award performance shares (stock-based compensation) to inside Directors only, [...]'. According to its 2021 Sustainability Report, the medium-term Management Plan includes 'Management foundation' as material issue, with different priority themes, among others, health and safety, diversity and inclusion and supply chain management. The Board of Directors include mostly internal corporate directors according the Company's website. The CEO is also a member of the Board. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Met: At least one key HR risk, beyond employee H&amp;S: It also discloses the different annual goals for each theme: 'increase percentage of employees receiving specific health guidance to 60% (...); Reduce the number of workplace injuries per 200,000 work hours. Target: TCIR (the total case incident rate) is less than 0.5. (...) Implement initiatives to make the ratio of female in management positions equal to the ratio of females in the company over the medium term; implement initiatives to make the ratio of female recruits equal to or greater than the general ratio of females in each region; (...) implement supply chain CSR assessment [includes human rights] for the following percentages of suppliers. Material suppliers: covering at least 80% of our procurement spend; logistic suppliers: 100% of customs-related operators; staffing suppliers: 100% of employment agencies and contracting companies (...)'. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public: Regarding Medium-term Performance-linked Compensation, the 2021 Sustainability Report indicates: 'the number of shares issued to each corporate directors varies according to the payout rate based on their respective responsibilities and level of performance goal achievement over the relevant three-year period. Consolidated operating margin and consolidated ROE have been adopted as indicators for measuring the levels of performance goal achievement which are linked to the Medium-term Performance-linked Compensation'. However, it is not clear the criteria linking remuneration to human rights performance. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Review of other board performance criteria</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy: According to an organigram found in its 2021 Sustainability Report, reports from its grievance mechanism may be reported to the Board of Directors or its Audit &amp; Supervisory Board Member. However, no further description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See A.1.2</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company reports: 'The CSR Management Council, the highest decision-making body regarding CSR, conducts discussions regarding the policy for the entire group, and important projects. Based on this, the CSR Global Committee discusses, that progress management regarding activities for achieving CSR targets along with the promotion of global projects, and shares best practices. At the CSR Monthly Meeting, information on activities is shared with representatives from each division, and collaborative systems are built to tackle cross-division themes. We are also working to strengthen our CSR structure by appointing officers in each division across the company to be in charge of understanding the CSR policy and goals and promoting CSR'. In addition, according to its website, Tatsuya Nagakubo is the Deputy General Manager, Global Business Platform Division (Human Resources, General Affairs, CSR, Branding, Legal, Compliance) Human Resources, General Affairs, CSR, Branding Division Legal, Compliance Division, Chairman of Ethics Committee. CSR covers human rights. [Sustainability Report 2020, 07/2020: <a href="http://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How it assigns Day-to-day responsibility: As indicated above, at the CSR Monthly Meeting, information on activities is shared with representatives from each division, and collaborative systems are built to tackle cross-division themes. We are also working to strengthen our CSR structure by appointing officers in each division across the company to be in charge of understanding the CSR policy and goals and promoting CSR'. In its Sustainability Report, it indicates: 'In addition to establishing the Code of Ethics as common and minimum standards of conduct by which all executives and employees should abide, we have also established a Business Ethics Committee for the purpose of promoting and raising awareness of compliance and corporate ethics more effectively within the TEL group'. [Sustainability Report 2020, 07/2020: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: The Company indicates: 'Compensation for inside Directors consists of fixed basic compensation, annual performance-linked compensation, and medium-term performance-linked compensation[...]. Medium-term performance-linked compensation is to award performance shares (stock-based compensation) to inside Directors only, [...]'. According to its 2021 Sustainability Report, the medium-term Management Plan includes 'Management foundation' as material issue, with different priority themes, among others, health and safety, diversity and inclusion and supply chain management. At least seven directors are members of the board of directors and of the executive board and inside directors. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Met: At least one key HR risk, beyond employee H&amp;S: It also discloses the different annual goals for each theme: 'increase percentage of employees receiving specific health guidance to 60% (...); Reduce the number of workplace injuries per</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>200,000 work hours. Target: TCIR (the total case incident rate) is less than 0.5. (...) Implement initiatives to make the ratio of female in management positions equal to the ratio of females in the company over the medium term; implement initiatives to make the ratio of female recruits equal to or greater than the general ratio of females in each region; (...) implement supply chain CSR assessment [includes human rights] for the following percentages of suppliers. Material suppliers: covering at least 80% of our procurement spend; logistic suppliers: 100% of customs-related operators; staffing suppliers: 100% of employment agencies and contracting companies (...). [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public: Regarding Medium-term Performance-linked Compensation, the 2021 Sustainability Report indicates: 'the number of shares issued to each corporate directors varies according to the payout rate based on their respective responsibilities and level of performance goal achievement over the relevant three-year period. Consolidated operating margin and consolidated ROE have been adopted as indicators for measuring the levels of performance goal achievement which are linked to the Medium-term Performance-linked Compensation'. However, it is not clear the criteria linking senior manager' remuneration to human rights performance. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: Regarding its Risk Management System and Initiatives, the 2021 Sustainability Report indicates: 'In order to promote more effective risk management, we carry out enterprise risk management through a body established within the General Affairs Department at our headquarters. This body works with the respective departments responsible for each operation to identify a wide range of risks arising in business activities, such as compliance risk, human resource and labor risk, and business continuity risk. It then classifies risks with high impact and probability as our key risks. The body also formulates and executes measures to minimize these key risks, monitors the effect of said measures, as well as works to understand the status of risk control, and implements the PDCA cycle for risk management. In fiscal year 2021 we introduced CSA and started a risk management committee'. Under the section Risk Management of its 2021 Integrated Report, the Company discloses its risks. Regarding its human resources risks, it indicates its main potential risk: 'the inability to recruit and retain necessary human resources on an ongoing basis or the inability to create an environment where people with diverse values and expertise can play an active role could lead to diminished product development capability or customer support quality'. No further reference to labor related risks found. However, although the Company indicates that its ERM covers labor risks, no further description found linking these to specific human rights risk (i.e equal opportunities, freedom of association, safety, forced labour, etc.). [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [2021 Integrated Report, 08/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment: The 2021 Sustainability Report indicates: 'The Global Audit Center serves as the internal audit department for the entire Group and implements audits based on the audit plan. Based on the results of these audits, it provides instructions for making improvements as needed, confirms the progress of these improvements, and provides any necessary support. The Group's internal control over financial reporting in fiscal year 2021 was also evaluated as effective by the independent auditors'. However, it is not clear how it assesses the adequacy of the enterprise risk management system in managing human rights during the company's last reporting year. The assessment was either overseen by the Board Audit Committee or conducted by an independent third party. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates: 'TEL is focusing on ensuring awareness and implementation of the Human Rights Policy internally and by suppliers. In fiscal year 2019, we published the policy on our website and made it available for everyone inside and outside the company, and implemented an online human rights education program targeting</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>all TEL executives and employees'. Training is assumed to take place in relevant languages. [Sustainability Report 2020, 07/2020: <a href="#">tel.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder: The webpage section Human Rights indicates: 'Our principles for respect for human rights are established in our Management Policies and Code of Ethics [...] The Group aspires to create a pleasant workplace environment where everyone can work free of discrimination by implementing employee training and establishing hotlines for prompt awareness and resolution of activities related to human rights issues'. In its feedback to CHRB, it indicates it has a webpage section called Sustainability, from which the Sustainability Report and the Integrated Report are accessible and well as information on its Human Rights approach. However, although the Company has various documents with Human Rights related information openly available as well as hotlines to report wrongs, it is not clear how it actively communicates its policy commitments to affected external stakeholders, including local communities. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Sustainability (web), N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain: The webpage section Human Rights indicates: 'Our principles for respect for human rights are established in our Management Policies and Code of Ethics [...] The Group aspires to create a pleasant workplace environment where everyone can work free of discrimination by implementing employee training and establishing hotlines for prompt awareness and resolution of activities related to human rights issues'. In its feedback to CHRB, it indicates it has a webpage section called Sustainability, from which the Sustainability Report and the Integrated Report are accessible and well as information on its Human Rights approach. The 2021 Sustainability Report indicates: 'To make its entire supply chain sound and sustainable, we have formulated a procurement policy based on the laws, regulations and social norms of each country, as well as the RBA Code of Conduct, and are promoting activities based on this policy by disseminating it throughout the Company and its suppliers'. However, it is not clear how it communicates its Human Rights policy down its supply chain. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Sustainability (web), N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Requires suppliers to communicate policy requirements: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The RBA indicates that the management system of the Company should contain: 'A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code'. However, although the Company indicates the Codes suppliers tier 1 and tier 2 should observe, it is not clear the steps it takes to communicate its human rights policy to its suppliers. [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual: The Procurement Policy indicates: 'We engage in procurement activities based on business ethics and with integrity, in compliance with the laws, regulations, and social norms of each country as well as the RBA Code of Conduct'. However, it is not clear how these commitments are reflected within contractual or other binding arrangements with its suppliers. [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company indicates in its Sustainability Report 2020: 'TEL is focusing on ensuring awareness and implementation of the Human Rights Policy internally and by suppliers. In fiscal year 2019, we published the policy on our website and made it available for everyone inside and outside the company, and implemented an online human rights education program targeting all TEL executives and employees'. Moreover, in its Sustainability Report 2019, the Company reports that all its employees received training in Human Rights in 2019. [Sustainability Report 2020, 07/2020: <a href="#">tel.com</a>] &amp; [Tokyo Electron Sustainability Report 2019, 18/11/2019: <a href="#">tel.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement: As for its Human Rights Policy, the Company states: 'We will communicate this policy to all employees, business partners and other relevant stakeholders including our customers and will provide training for all the executives and employees of TEL</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>group'. Also, the Company indicates, in its 2021 Sustainability Report, that it ensures 'that our executives and employees, as well as suppliers, are fully aware of this content'. Also: 'We signed onto the United Nations Global Compact UNGC) and support its Ten Principles in the four areas of Human Rights, Labor, Environment, and Anti-Corruption, to realize sound globalization and a sustainable society. Additionally, as a corporate member of the Responsible Business Alliance (RBA), we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections (Labor, Environment, Health and Safety, Ethics and Management Systems)'. However, no evidence against procurement training on human rights issues relevant to their role. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: As indicated above, regarding its Human Rights Policy, it states: 'We will communicate this policy to all employees, business partners and other relevant stakeholders'. The 2021 Sustainability Report indicates: 'To keep track of our suppliers' engagement in CSR activities, we have conducted a CSR assessment in areas such as labor, health and safety, the environment and ethics since fiscal year 2014. We analyze the results of the assessments, provide feedback and work together with our suppliers to remediate any issues. When giving feedback, we distribute a feedback sheet that explains the content and use it to train our business partners as needed'. However, it is not clear training is also provided to suppliers to help them meet its human rights policy commitment nor how. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Disclose % trained: Although the Company provides, in its 2021 Sustainability Report, figures on CSR assessments, it is not clear the percentage of suppliers trained. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: It indicates: 'In fiscal year 2021, as in the previous fiscal year, we conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct, and also reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain'. However, it is not clear how it monitors the implementation of its human rights policy commitment(s) across its global operations as the evidence seems to focus on the monitoring of its supply chain. [Human Rights (web), N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored: The 2021 Sustainability Report indicates the percentage of suppliers at which supply chain CSR assessments were implemented: 'Material suppliers: Achieved 80% or more of our procurement spend. Logistics suppliers: Achieved 100% of customs-related operators. Staffing suppliers: Achieved 100% of employment agencies and contracting companies (internal contractors)'. However, it is not clear the total percentage of its supply chain that these figures represent. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [Sustainability goals and result (web), N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Describes corrective action process: In the webpage section Supply Chain Management, the Company indicates: 'To keep track of our suppliers' engagement in CSR activities, we have conducted a CSR assessment in areas such as labor, health and safety, the environment and ethics since fiscal year 2014. We analyze the results of the assessments, provide feedback and work together with our suppliers to remediate any issues'. The 2021 Sustainability Report indicates: 'In fiscal year 2021, with the help and understanding of our suppliers, steps were taken to repay workers with respect to cases of an employment-related expense burden for forced labor and bonded labor, which had been identified in the previous fiscal year and which have been given particular emphasis in the RBA Code of Conduct'. However, although the Company indicates it works together with suppliers to remedy non-compliances and it provides an example repayment of fees, no further description of its corrective action process found. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Disclose findings and number of corrective action: The 2021 Sustainability Report discloses the Supplier Human Rights Risk Survey Results: 35% of the Companies were considered to have potential/actual risks, while 65% were considered to have low risk. Moreover, 'In fiscal year 2021, with the help and understanding of our suppliers, steps were taken to repay workers with respect to cases of an employment-related expense burden for forced labor and bonded labor, which had been identified in the previous fiscal year and which have been given particular emphasis in the RBA Code of Conduct'. Although the Company indicates percentages of potential/actual risk suppliers and provides an example of a corrective action, no evidence found of the number of corrective action process as a result of the monitoring. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: It indicates: 'Before starting business with new suppliers, an STQA is conducted via self-assessment to evaluate their product quality, costs, and information security. The assessment also includes CSR issues, including human rights, ethics, safety, and the environment'. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: HR affects on-going supplier relationships: In addition to the above the Company states that: 'To make its entire supply chain sound and sustainable, Tokyo Electron has formulated a procurement policy [...] and is promoting activities based on this policy by disseminating it throughout the company and its suppliers. We also promote improvement activities from various perspectives while valuing continuous communication with diverse suppliers, including materials suppliers that handle parts and raw materials, staffing suppliers that provide services and logistics suppliers that handle physical distribution operations'. Additionally, 'If any risks to quality are found, we visit the supplier on-site to explain the problems, our expectations for improvement, and the level of quality we require. After the supplier understands the issues, we ask that they plan and implement improvement measures. We also offer continual support to suppliers until all necessary improvements have been made. We conduct on-site audits once every three years at suppliers who manufacture important components and at suppliers where quality issues have been found'. Also: 'To keep track of our suppliers' engagement in CSR activities, we have conducted a CSR assessment in areas such as labor, health and safety, the environment and ethics since fiscal year 2014. We analyze the results of the assessments, provide feedback and work together with our suppliers to remediate any issues'. However, no description found of decisions to renew, expand or terminate business relationships in case of violations of human rights. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements: The webpage section Supply Chain Management indicates: We strive to create value in the supply chain by working to build relationships of trust with our suppliers, who support our business as partners, and by working together to conduct operations in compliance with global standards. Under the leadership of the Representative Director, President &amp; CEO, issues identified during various activities are shared with relevant divisions for consideration and action on specific improvements'. However, although it indicates that it works with suppliers, it is not clear how the actual work conducted with including suppliers to help them meet human rights requirements. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>]</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses, in its 2021 Sustainability Report a chart with all the relevant stakeholders the Company maintains communications, including workers, local communities, suppliers, governments and association. Moreover, the Company indicates that it has conducted human rights risk surveys at suppliers'. The 2021 Integrated Report also discloses information on it Internal Reporting System, a 'system that allows employees to raise questions and concerns about business ethics and compliance'. It also explains about employee engagement: 'we have been regularly conducting engagement surveys since fiscal 2016 to assess the current state of employee engagement and identify issues'. However, it is not clear the process by which it identifies stakeholders with whom to engage on human rights. Current evidence refers systems to engagement part of the process. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>in use. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [2021 Integrated Report, 08/2021: <a href="#">tel.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders: The 2021 Integrated Report explains about employee engagement: ‘we have been regularly conducting engagement surveys since fiscal 2016 to assess the current state of employee engagement and identify issues. [...] These initiatives resulted in an increase in the employee engagement score on 12 points from fiscal 2016 to fiscal 2021 and a turnover rate of 2.5%’. No further details found on other example of engagement with stakeholders whose human rights might have been affected, and whether engagement may include human rights-related issues.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues: The 2021 Integrated Report explains about employee engagement: ‘we have been regularly conducting engagement surveys since fiscal 2016 to assess the current state of employee engagement and identify issues. [...] These initiatives resulted in an increase in the employee engagement score on 12 points from fiscal 2016 to fiscal 2021 and a turnover rate of 2.5%’. However, no summary analysis of the input/views given by stakeholders on human rights issues found [2021 Integrated Report, 08/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Describe how views influenced company's HR approach: The 2021 Integrated Report explains about employee engagement: ‘we have been regularly conducting engagement surveys since fiscal 2016 to assess the current state of employee engagement and identify issues. Based on the results of the surveys, our management takes the lead in making improvements to foster a better workplace environment and culture’. However, it is not clear how the views of stakeholders have influenced the development or monitoring of its human rights approach. [2021 Integrated Report, 08/2021: <a href="#">tel.com</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations: The Company's website states that in '2021, as in the previous fiscal year, we conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct, and also reviewed the results of a CSR assessments for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain'. Similar evidence is found in the 2021 Sustainability Report. Moreover, its Human Rights Policy states: ‘We will establish a human rights risk assessment process that will identify and assess our actual and potential adverse human rights risks and impacts, and respond to identified risks and impacts’. However, it is not clear how the process it uses identifies its human rights risks and impacts in specific locations or activities. Current evidence seems to focus in monitoring compliance for suppliers. It is not clear the process followed to identify which are the potential risks and impacts of its direct activities. Although CSR assessments can be part of the process, it is not clear how these are integrated. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Identifying risks through relevant business relationships: As previous indicated: ‘As part of the surveys, we (...) reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain’. Moreover, its Human Rights Policy states: ‘We will establish a human rights risk assessment process that will identify and assess our actual and potential adverse human rights risks and impacts, and respond to identified risks and impacts’. However, it is not clear how human rights risk and impact identification happens in specific locations or activities through relevant business relationships, including its supply chain. Current evidence seems to focus in monitoring compliance for suppliers. It is not clear the process followed to identify which are the potential risks and impacts of its direct activities, beyond conducting questionnaires. Although these can be part of the process, it is not clear how they are later integrated to the due diligence process. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company's website states that in '2021, as in the previous fiscal year, we conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts [...]'. The 2021 Integrated Report indicates: 'Actively providing opportunities for engagement with our stakeholders and promoting mutual communication allows us to accurately comprehend their requirements and reflect them in our business activities. We strive to build a solid relationship of mutual trust with all the stakeholders surrounding our company and respond to each of their expectations, so that we can fulfill our roles and responsibilities in society'. Suppliers, workers and local communities are part of the Company's stakeholders. However, no further description found, including whether consultation with affected stakeholders is included as part of the due diligence process and whether and internal or independent external human rights experts are consulted in risk and impact identification. The Company provides, in its feedback to CHRB, additional comments for this indicator. However, it is related to due diligence in its conflict mineral supply chain, with is assessed in a different part of CHRB research. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: In its webpage Human rights, it indicates: 'In fiscal year 2021, as in the previous fiscal year, we conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct'. Additionally: 'inside our company, we identified potential human rights risks in the areas of labor, and health and safety'. Moreover, its Human Rights Policy states: 'We will establish a human rights risk assessment process that will identify and assess our actual and potential adverse human rights risks and impacts, and respond to identified risks and impacts'. However, no further description found of the process for assessing its human rights risks. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: How process applies to supply chain: In its webpage Human rights, it indicates: 'In fiscal year 2021, as in the previous fiscal year, we conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts. As part of the surveys, we (...) reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain'. Moreover, its Human Rights Policy states: 'We will establish a human rights risk assessment process that will identify and assess our actual and potential adverse human rights risks and impacts, and respond to identified risks and impacts'. However, no further description found of the process for assessing its human rights risks. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Public disclosure of the results of HR assessment: The 2021 Sustainability Report indicates: 'We conduct Group-wide reviews to identify the current status of risk management as well as any potential and actual risks surrounding the Company in the future. Based on the results of the reviews, we have identified the following 13 risks as having potential to cause significant issues to our financial condition, operating results and cash flows, and are working to address them'. It then discloses the risks. Regarding the risk 'human resources' it notes: 'Regarding its human resources risks, it indicates its main potential risk: 'the inability to recruit and retain necessary human resources on an ongoing basis or the inability to create an environment where people with diverse values and expertise can play an active role could lead to diminished product development capability or customer support quality'. The other risks are quality, safety, laws and regulations, among others. Although the Company discloses its business risks, no further evidence found of Human Rights risks it may have found as a result of its Human Rights assessments. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment: The 2021 Integrated Report indicates: 'Actively providing opportunities for engagement with</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>our stakeholders and promoting mutual communication allows us to accurately comprehend their requirements and reflect them in our business activities. We strive to build a solid relationship of mutual trust with all the stakeholders surrounding our company and respond to each of their expectations, so that we can fulfill our roles and responsibilities in society'. Stakeholders include communities, workers and suppliers, among others. Additionally, regarding its human rights initiatives, the 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct, and also reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain. We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. Although the Company indicates that it engages with different groups of stakeholders, it is not clear how it involves affected stakeholders in the assessment process. [2021 Integrated Report, 08/2021: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</p>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks: The webpage section Human Rights indicates: 'By continuing to conduct human rights due diligence going forward, we will assess and correct any human rights issues we identify in our business activities and further improve the grievance mechanisms we provide'. Moreover, the Human Rights Policy states: 'We will build and operate a human rights impact assessment and remediation process framework. Through this framework, we will strive for the prevention, mitigation and remediation of, and avoidance of contributing to, adverse human rights impacts if they exist either directly or indirectly through our own activities and those activities associated with our business relationships'. The 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts[...]. We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. It indicates that in the remediation phase of the process, the following actions are taken to reduce risks based on assessment results: feedback sheet publication and program development and review according to issues. It also notes: 'we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline—a global common internal point of contact that uses a third-party system that is also accessible to our suppliers—as well as an external point of contact that allows direct consultation with an outside law firm'. It then explains the mechanism more comprehensively and disclose some results. However, although discloses different steps it takes, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues identified. Current evidence seems to refer to a compliance monitoring system that includes individual supplier monitoring/assessment and corrective action processes for non-compliances (assessed in indicator B.1.6). This indicator looks for evidence of how the Company conducts broad, proactive actions to prevent/mitigate the risks and impacts that it considers to be salient, rather than correcting individual suppliers non-compliances. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues: According to its 2020 Sustainability Report: 'In March 2020, we enhanced the internal reporting system, and renamed TEL group Ethics &amp; Compliance Hotline—a global common point of contact that uses a third-party system—thereby ensuring a greater level of confidentiality and anonymity. In the event of a report or request for advice, the TEL group undertakes an investigation in accordance with internal regulations'. It also discloses information about other initiatives related to monitoring supply chain CSR activities. The 2021 Modern Slavery Statement indicates: 'We proactively continued activities of our human rights project team with representatives from our compliance, human resources, procurement, logistics and CSR departments as well as 3rd parties human rights professional. The team has focused on conducting the CSR assessment, evaluation and analysis of assessment results. The team has now established the process to promote and support corrective actions by our suppliers and requested them for their cooperation for corrective actions to mitigate the risk in our supply chain'. However, this indicator looks for specific action plans to mitigate a specific salient issue. The 2021 Sustainability Report indicates: 'In fiscal year 2021, with the help and understanding of our suppliers, steps were taken to repay workers with respect to cases of an employment-related expense burden for forced labor and bonded labor, which had been identified in</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the previous fiscal year and which have been given particular emphasis in the RBA Code of Conduct'. However, this seems to be an example of corrective action in order to address a non-compliance. The indicator focuses on proactive actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years with the aim of preventing or mitigating risks from a risk based approach rather than individual supplier approach. [Sustainability Report 2020, 07/2020: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective: The webpage section Human Rights indicates: 'We will establish a human rights risk assessment process that will identify and assess our actual and potential adverse human rights risks and impacts, and respond to identified risks and impacts. The policy [Human Rights] will be appropriately updated as needed based on the results of the process. We will also conduct periodical reviews of the effectiveness of these responses, and report on our human rights performance'. According to its 2021 Sustainability Report, the remediation phase is among its Human Rights initiatives and it entails: feedback sheet publication and program development and review according to issues. It also indicates that the Supply Chain CSR Process includes plan, do, check and act. The item 'check' involves: 'implementation of supply chain CSR assessment and analysis of response. 'Act' translates into: 'provision of feedback based on the results and requests for improvement to suppliers'. However, no further description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Human Rights (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken: The 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. As part of the surveys, we utilizes a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct, and also reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain. We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. However, it is not clear how it involves affected stakeholders in evaluation of whether the actions taken have been effective. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: The Company describes its stakeholder engagement process and that it has 'conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. As part of the surveys, we utilizes a self-assessment questionnaire (SAQ) for internal use, based on the RBA Code of Conduct, and also reviewed the results of a CSR assessment for suppliers of materials, staffing and logistics to assess the current situation throughout the value chain', it is not clear how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. The Company is expected to provide two examples demonstrating how it communicates with them. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

## C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company indicates that 'we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline—a global common internal point of contact that uses a third-party system that is also accessible to our suppliers—as well as an external point of contact that allows direct consultation with an outside law firm. The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. [Compliance/Code of Ethics (web), N/A: <a href="tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: As it is stated above, in the Code of Ethics: 'The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. The 2020 Sustainability Report indicates: 'TEL is focusing on ensuring awareness and implementation of the Human Rights Policy internally and by suppliers. In fiscal year 2019, we published the policy on our website and made it available for everyone inside and outside the company, and implemented an online human rights education program targeting all TEL executives and employees'. The Human Rights Policy contains information on the grievance mechanism. [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="tel.com">tel.com</a>]</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: According to the RBA Code of Conduct the management system should contain the following elements: 'Worker Feedback, Participation and Grievance: Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. [RBA Code of Conduct 7.0, 01/01/2021: <a href="responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="tel.com">tel.com</a>]</li> <li>• Met: Expect Suppliers to convey expectation to their own suppliers: As it is stated above, according to the RBA Code of Conduct the management system should contain the following elements: 'Worker Feedback, Participation and Grievance: Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. The RBA Code also notes: '[RBA] Participants must regard the Code as a total supply chain initiative. At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code'. The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. [RBA Code of Conduct 7.0, 01/01/2021: <a href="responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="tel.com">tel.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism for community: The 2021 Sustainability Report indicates: 'we have established an internal reporting system that ensures complete confidentiality, anonymity and the prohibition of retribution so that employees can safely and reassuringly provide information and seek redress outside the chain of command about behavior that is, or may be, in violation of laws, regulations or business ethics. [...] we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline—a global common internal point of contact that uses a third-party system that is also accessible to our suppliers—as well as an external point of contact that allows direct consultation with an outside law firm. The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. Similar information is found in the 2021 Integrated Report. The EthicsPoint - Data Protection &amp; Privacy Notice notes: 'This service is a web and phone-based intake system provided by TEE to Employees'. However, it is not clear the different grievance mechanisms are available of all external individuals and communities. [EthicsPoint - Data Protection &amp; Privacy Notice, N/A: <a href="secure.ethicspoint.eu">secure.ethicspoint.eu</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: The grievance channel is available in 15 languages. Although information on the channel is published in its reports and on its webpage, it is not clear how the Company actively ensures that all affected external stakeholders at its own</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>operations are aware of it, and that external stakeholders, including local communities, can use it. [EthicsPoint (web), N/A: <a href="https://secure.ethicspoint.eu">secure.ethicspoint.eu</a>] &amp; [Contact us., N/A: <a href="https://tel.com">tel.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed: The webpage section EthicsPoint indicates: 'After you complete your report you will be assigned a unique code called a "report key." (...) After 5-6 business days, use your report key and password to check your report for feedback or questions'. Also, the Code of Ethics notes: 'The Company treats ethics and compliance concerns reported in good faith very seriously. The Company assigns an investigation team, conducts an investigation and, if the concern is substantiated, takes corrective actions including disciplinary action if necessary. The individual who raised the concern will receive feedback on the outcome. The Company also expects all Officers and Employees of the Company to cooperate with investigations'. However, no further details of the procedures for managing the complaints found, including timescales for addressing the complaints or concerns. [EthicsPoint (web), N/A: <a href="https://secure.ethicspoint.eu">secure.ethicspoint.eu</a>] &amp; [The Code of Ethics, 01/05/2020: <a href="https://tel.com">tel.com</a>]</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants: The 2021 Sustainability Report indicates: 'we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline-a global common internal point of contact that uses a third-party system that is also accessible to our suppliers-as well as an external point of contact that allows direct consultation with an outside law firm. The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. However, no further description found of the technical, financial or advisory support available to complainants to enable equal access to and participation in the grievance process. [2021 Sustainability Report, 07/2021: <a href="https://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level: The 2021 Sustainability Report indicates: 'we have established and are operating the Tokyo Electron Group Ethics &amp; Compliance Hotline-a global common internal point of contact that uses a third-party system that is also accessible to our suppliers-as well as an external point of contact that allows direct consultation with an outside law firm. The internal point of contact can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. Moreover, according to an organigram found in the same Report, reports from its grievance mechanism may be reported to the Board of Directors or its Audit &amp; Supervisory Board Member. However, it is not clear if escalation to more senior levels or independent third party adjudicators or mediators also entails challenging the process or outcome and that it can be done at complainant discretion. [2021 Sustainability Report, 07/2021: <a href="https://tel.com">tel.com</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation: The Code of Ethics indicates: 'The Company will not tolerate retaliation against those who report ethics and compliance concerns in good faith. No one is permitted to engage in retaliation, or any form of retaliatory behaviors, against another for reporting ethics and compliance concerns in good faith or cooperating with an investigation'. However, it is not clear the different grievance mechanisms are available of all external individuals and communities, as the online platform indicates: 'This service is a web and phone-based intake system provided by TEE to Employees'. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [The Code of Ethics, 01/05/2020: <a href="https://tel.com">tel.com</a>] &amp; [EthicsPoint - Data Protection &amp; Privacy Notice, N/A: <a href="https://secure.ethicspoint.eu">secure.ethicspoint.eu</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation: The Code of Ethics notes: ‘The Company will not tolerate retaliation against those who report ethics and compliance concerns in good faith. No one is permitted to engage in retaliation, or any form of retaliatory behaviors, against another for reporting ethics and compliance 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 is grounds for disciplinary action’. The 2021 Sustainability Report indicates ‘to ensure awareness of the Code of Ethics, we have translated it into five languages, [...] and have distributed it in form of a booklet to all executive and employees. [...] We are also striving it raise awareness if compliance and corporate ethics by regularly obtaining confirmation from all executives and employees that they understand and comply with the revised content’. Additionally, it notes it has the annual goal of achieving ‘pledge rate of 100%’, it also indicates that it has achieve ‘Code of Ethics education and pledge rate: 98.8%’. [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>] Score 2</li> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The RBA Code of Conducts indicates: ‘workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation’. However, the grievance channel required does not seem to include external stakeholders. The Procurement Policy indicates: ‘we ask our suppliers to observe (...) the RBA Code of Conduct’. No evidence that the Company expects its business partners to prohibit retaliation against workers and other stakeholders for raising human rights related complaints or concerns. [RBA Code of Conduct 7.0, 01/01/2021: <a href="responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="tel.com">tel.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>]</li> <li>• Not Met: Company does not require confidentiality provisions: The Code of Ethics indicates: ‘Confidentiality is required and should be respected for an effective investigation. Where possible, keeping investigations confidential is in the best interest of the Company and investigation participants such as the reporter, the subject of the investigation and witnesses. Information will only be disclosed as required by legitimate needs of the investigation. The Company requests all the participants to maintain confidentiality, and this requirement also extends equally to investigators and management. Breach of confidentiality is grounds for disciplinary action’. However, in order to meet CHRB criterion, the Company is expected to indicate that does not require confidentiality provisions (e.g., non-disclosure agreements) with respect to human rights grievances. [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>] Score 2</li> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: The 2021 Sustainability Report indicates: ‘In fiscal year 2021, with the help and understanding of our suppliers, steps were taken to repay workers with respect to cases of an employment-related expense burden for forced labor and bonded labor, which had been identified in the previous fiscal year and which have been given particular emphasis in the RBA Code of Conduct’. [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>]</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified: The Company’s Human Rights Policy indicates they ‘We will build and operate a human rights impact assessment and remediation process framework. Through this framework, we will strive for the prevention, mitigation and remediation of, and avoidance of contributing to, adverse human rights impacts if they exist either directly or indirectly through our own activities and those activities associated with our business relationships’. However, no further description found of the approach the Company would take to provide or enable timely remedy for victims. [Human Rights Policy, 29/09/2017: <a href="tel.com">tel.com</a>] Score 2</li> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The 2021 Sustainability Report indicates: 'In fiscal year 2021, a total of 82 cases were received via the internal reporting system, of which 6 were recognized as compliance violations. The reports and requests for advice primarily related to harassment, but some concerned the improper reporting of attendance and breaches of internal procedures. As a result, we have conducted regular education programs for our employees to prevent harassment and have provided thorough follow-up with those concerned or involved. [...] If a compliance violation is found, disciplinary action is taken in accordance with the Rules of Employment, and preventive measures and corrective measures, such as improvements to the workplace environment, are implemented as necessary. However, no information found on the number of grievances specifically about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets target date: The Company indicates on its website that: 'In addition to a level of remuneration that is competitive in the market, the system provides the employee with career opportunities as well as a productivity-linked bonus proportionate to their degree of achievement (contribution)'. The 2021 Sustainability Report indicates: 'we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections'. No reference to living wages found in the RBA Code. The Human Rights Policy states: 'we will not engage in or allow discrimination [...] in hiring and employment practices such as [...] wages, rewards and promotions'. However, it is not clear it has a timebound target for paying all workers a living wage or that the company indicates that it pays all workers a living wage. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Human Resource (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions: The Company has provided additional comments to this indicator, however, its content has not been found in publicly available sources.</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. Similarly, the 2021 Sustainability Report indicates: 'To make its entire supply chain sound and sustainable, Tokyo Electron has formulated a procurement policy based on the laws, regulations and social norms of each country, as well as the RBA Code of Conduct, and is promoting activities based on this policy by disseminating it throughout the Company and its suppliers'. The Code indicates: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [CSR Related Policy, N/A: <a href="#">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>]</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress: The 2021 Sustainability Report indicates: 'To keep track of our suppliers' engagement in CSR activities, we have conducted a CSR assessment in areas such as labor, health and safety, the environment and ethics since fiscal year 2014. We analyze the results of the assessments, provide feedback and work together with our suppliers to remediate any issues. In fiscal year 2019, we completely revised the content of the survey based on audit standards stipulated by the RBA and have since conducted surveys on materials, staffing and logistics suppliers'. However, analysis of trends demonstrating progress on living wages found. [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>]</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices): The Code of Ethics indicates: 'We select suppliers based on objective criteria and review their qualifications by ensuring that they comply with laws and regulations as well as our business ethics. We select our suppliers based on objective criteria, such as quality, technology, price, delivery times, compliance and other reasonable standards'. However, no description found of the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>]</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The 2021 Integrated Report indicates: 'we have built an important component traceability system as part of our effort to strengthen our information environment'. The 2021 Sustainability Report discloses percentage of supplier sites by country for the FY2021. However, it is not clear the Company identifies its suppliers, including direct and indirect suppliers. [2021 Integrated Report, 08/2021: <a href="tel.com">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not use child labour: It indicates: 'We also do not engage in (...) child labor or any other form of modern slavery'. [The Code of Ethics, 01/05/2020: <a href="tel.com">tel.com</a>]</li> <li>• Not Met: Age verification of workers recruited: In its Sustainability Report the Company states: 'In fiscal year 2020, we also conducted human rights due diligence, as well as risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use based on the RBA Code of Conduct, [...]', which includes a provision to prohibit child labour. However, no evidence found that the Company verifies the age of job applicants and workers in its own operations to ensure that they are not engaged in child labour. [2021 Sustainability Report, 07/2021: <a href="tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'Child labor is not to be used in any stage of manufacturing. (...) Participants shall implement an appropriate mechanism to verify the age of workers. (...) If child labor is identified, assistance/remediation is provided'. The Company has provided an additional source to this indicator, however key information was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="tel.com">tel.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made: The 2021 Sustainability Report indicates: 'To keep track of our suppliers' engagement in CSR activities, we have conducted a CSR assessment in areas such as labor, health and safety, the environment and ethics since fiscal year 2014. We analyze the results of the assessments, provide feedback and work together with our suppliers to remediate any issues. In fiscal year 2019, we completely revised the content of the survey based on audit standards stipulated by the RBA and have since conducted surveys on materials, staffing and logistics suppliers'. However, no an analysis of trends found demonstrating progress on child labor. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> </ul>
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Job seekers and workers do not pay recruitment fee: The 2021 Sustainability Report indicates: 'as a corporate member of the Responsible Business Alliance (RBA), we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections (Labor, Environment, Health and Safety, Ethics and Management Systems)'. Regarding the RBA Code, the Human Rights Policy indicates: 'we also refer to the [...] RBA Code of Conduct in order to grasp the demands of the times and human rights issues in our industry'. The RBA Code indicates: 'Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. However, although it indicates that it is a that is a member of the RBA and that it refers to its Code, it is not clear that it follows the Code for its own operations. The Human Rights Policy indicates: 'We have zero tolerance for child labor, forced labor, bonded labor and human trafficking'. However, no further information found indicating that job seekers and workers do not pay any recruitment fees or related costs to secure a job (The Employer Pays Principle). [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment'. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees: The 2021 Sustainability Report indicates: 'In fiscal year 2021, with the help and understanding of our suppliers, steps were taken to repay workers with respect to cases of an employment-related expense burden for forced labor and bonded labor, which had been identified in the previous fiscal year and which have been given particular emphasis in the RBA Code of Conduct'. However, the example given seem to refer to a corrective action to address a non-compliance. The indicator focuses on specific, proactive work the Company conducts with suppliers to prevent recruitment fees and related costs from happening. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays workers in full and on time: The 2021 Sustainability Report indicates: ‘as a corporate member of the Responsible Business Alliance (RBA), we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections (Labor, Environment, Health and Safety, Ethics and Management Systems)’. Regarding the RBA Code, the Human Rights Policy indicates: ‘we also refer to the [...] RBA Code of Conduct in order to grasp the demands of the times and human rights issues in our industry’. The RBA Code indicates: ‘Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. (...) Deductions from wages as a disciplinary measure shall not be permitted’. However, although it indicates that it is a that is a member of the RBA and that it refers to its Code, it is not clear that it follows the Code for its own operations. Moreover, no provision to pay workers in full and on time found in the Code. The Human Rights Policy indicates: ‘We have zero tolerance for child labor, forced labor, bonded labor and human trafficking’. However, no evidence found that the Company indicates that it pays workers in full and on time. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Payslips show any legitimate deductions: As indicated above, the 2021 Sustainability Report indicates: ‘as a corporate member of the Responsible Business Alliance (RBA), we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections (Labor, Environment, Health and Safety, Ethics and Management Systems)’. Regarding the RBA Code, the Human Rights Policy indicates: ‘we also refer to the [...] RBA Code of Conduct in order to grasp the demands of the times and human rights issues in our industry’. The RBA Code indicates: ‘For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed’. However, although it indicates that it is a that is a member of the RBA and that it refers to its Code, it is not clear that it follows the Code for its own operations. No further evidence found that all workers receive a payslip with their wages explaining any legitimate deductions. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Procurement Policy indicates: ‘we ask our suppliers to observe (...) the RBA Code of Conduct’. The Code indicates: ‘For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed [...] Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted’. [CSR Related Policy, N/A: <a href="#">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>]</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Does not retain documents or restrict movement: The 2021 Sustainability Report indicates: ‘as a corporate member of the Responsible Business Alliance (RBA), we promote sustainability in our supply chain by abiding by the RBA Code of Conduct comprised of five framework sections (Labor, Environment, Health and Safety, Ethics and Management Systems)’. Regarding the RBA Code, the Human Rights Policy indicates: ‘we also refer to the [...] RBA Code of Conduct in order to grasp the demands of the times and human rights issues in our industry’. The RBA Code indicates: ‘Employers, agents, and sub-agents’ may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents’. However, although it indicates that it is a that is a member of the RBA and that it refers to its Code, it is not clear that it follows the Code for its own operations. The Human Rights Policy indicates: ‘We have zero tolerance for child labor, forced labor, bonded labor and human trafficking’. However, no information found indicating it does not retain workers’ personal documents or restrict workers’ freedom of movement or require workers to use company provided accommodation. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Procurement Policy indicates: ‘we ask our suppliers to observe (...) the RBA Code of Conduct’. The Code indicates: ‘There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers’ dormitories or living quarters. (...) All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker’s contract. Employers, agents, and sub-agents’ may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law’. The Company has provided an additional source to this indicator, however key information was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: How working with suppliers on free movement: The webpage section Supply Chain Management It indicates: ‘Regarding the human rights issue of “freely chosen employment,” we have expressly stipulated our zero-tolerance policy for forced labor and bonded labor, and by communicating this to our major suppliers, we are promoting initiatives to ensure that all people in our supply chain can work of their own free will’. Regarding its human rights initiatives, the 2021 Sustainability Report indicates: ‘in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. [...] We are using the results of these surveys to consider corrective actions and reduce Human Rights risks’. It adds: ‘We will work to reduce Human Rights risks by promoting corrective actions together with our suppliers’. However, no further description found of how it works with suppliers to eliminate retention of worker’s documents or other actions to physically restrict movement. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates that 'We respect the right of employees to freely associate (form and join groups) and to voluntarily discuss and negotiate their relations with their employers as well as respect the right of the employees to refrain from such activities'. However, no commitment found to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law), to bargain collectively, and putting in place measures to prohibit harassment or retaliation against workers seeking to exercise these rights. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Discloses % total direct operations covered by collective CB agreements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment'. However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB: Regarding its human rights initiatives, the 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. [...] We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. It adds: 'We will work to reduce Human Rights risks by promoting corrective actions together with our suppliers'. However, no further description found of how it works with suppliers to support the practices of its suppliers in relation to freedom of association and collective bargaining. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The Company indicates: 'Besides conducting various medical check-ups in accordance with the law, we offer face-to-face consultations by designated occupational health physicians for employees who work long hours. Furthermore, we are working on strengthening health-related support, organizing (...) holding liaison meeting with the health officers and health professionals at each Group company in Japan. (...) we are actively expanding data health initiatives providing employees health guidance and effective prevention and health promotion according to their individual circumstances by utilizing data from medical check-ups'. Moreover, regarding safety, the website indicates: 'Based on a culture of "Safety First," we carry out ongoing activities for safety promotion. In an effort to raise the overall level of safety and occupational health, we use a management system based on OHSMS to manage safety and occupational health and also follow the PDCA cycle to reduce the potential risk of work-related incidents. Moreover, by sharing information of any issues at internal meetings, such as those of the EHS Council and the Manufacturing Company Presidents' Council, we promote safety management as a company-wide initiative'. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>] &amp; [Safety (web), N/A: <a href="#">tel.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses in a table the TCIR (number of workplace injuries per 200,000 hours worked) for the reporting year and the previous 5 years (FY 2021: 0.27). [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Discloses Fatalities for last reporting period</li> <li>• Not Met: Occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The Company indicates: 'the TCIR [number of workplace injuries per 200,000 hours worked] has been maintained at less than the company's target of 0.5 with the 0.27 in fiscal year 2021'. However, no evidence found of targets related to fatalities. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems: The Company reports that it has met the workplace injury target for the last year. However, no evidence of health and safety targets related to fatalities. [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code health and safety standards include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. The Company has provided an additional source to this indicator, however key information was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="#">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="#">tel.com</a>]</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for lasting reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to stop harassment and violence against women: The Company indicates, in its 2019 Sustainability Report, that in 2019, a Diversity Promotion Team was launched, which 'conducted an employee awareness survey, focusing on female employees, managers, regarding one element of diversity: gender diversity, achieving a response rate of approximately 80%'. Also, it indicated the promotion of seminars against power harassment, attended by 90% of the Company. In its Human Rights Policy the Company states that it has 'zero tolerance for any type of harassment in any work-related circumstance'. The 2021 Sustainability Report indicates: 'At Tokyo Electron, diversity and inclusion are management pillars that lead to the continuous generation of innovation and increased corporate value. We are actively pursuing them with the strong commitment of our management. Although the areas of emphasis for diversity and inclusion vary by country, we have taken on gender and nationality as major themes and put the following goals and initiatives in place based on the characteristics of each region'. [Tokyo Electron Sustainability Report 2019, 18/11/2019: <a href="#">tel.com</a>] &amp; [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The Human Rights Policy it states: 'we will not engage in or allow discrimination based on [...] gender [...] in hiring and employment practices such as [...] wages, rewards and promotions'. However, it is not clear how it measures and takes steps to address any gender pay gap throughout all levels of employment. [Human Rights Policy, 29/09/2017: <a href="#">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers'. However, no evidence found of a requirement to provide equal pay for equal work and to introduce measures to ensure equal opportunities throughout all levels of employment. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="https://tel.com">tel.com</a>]</li> <li>• Not Met: How working with suppliers on women's rights: Regarding its human rights initiatives, the 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. [...] We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. It adds: 'We will work to reduce Human Rights risks by promoting corrective actions together with our suppliers'. However, no further description found of how it works with suppliers to improve their practices in relation to women's rights. [2021 Sustainability Report, 07/2021: <a href="https://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Respects max hours, min breaks and rest periods in its own operations: The Human rights policy states that 'we respect the right of employees to live a healthy life. We conduct our business in compliance with all applicable laws and regulations relating to working hours, breaks, holidays and vacation days'. The 2021 Sustainability Report indicates that it 'recommends work styles that incorporate work-life balance and continuously develops work environments to enable this. We are promoting efficient ways of working suited to our employees' lifestyles and social situations so that our employees can make the most of their work hours by utilizing a teleworking system in addition to a flextime system'. It also indicates how it has stabilised a leave system. However, no reference found to International standards, ILO conventions, or standard weekly hours. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [Human Rights Policy, 29/09/2017: <a href="https://tel.com">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="https://tel.com">tel.com</a>]</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets: It indicates: 'we are renewing our efforts to fully manage working hours and also taking steps to improve operational efficiency further'. However, it is not clear the Company assesses the ability of workers, within its factories, to comply with its commitments to respect working hours and minimum breaks and rest periods when allocating work or setting targets. [Human Rights (web), N/A: <a href="https://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Working hours in codes or contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. (...) Workers shall be allowed at least one day off every seven days'. However, requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods found. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [RBA Code of Conduct 7.0, 01/01/2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [CSR Related Policy, N/A: <a href="https://tel.com">tel.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on working hours: Regarding its human rights initiatives, the 2021 Sustainability Report indicates: 'in the fiscal year 2021 [...] we conducted Human Rights due diligence, as well as risk surveys, and identifies and assessed impacts. [...] We are using the results of these surveys to consider corrective actions and reduce Human Rights risks'. It adds: 'We will work to reduce Human Rights risks by promoting corrective actions together with our suppliers'. However, no further description found of how it works with suppliers to improve their practices in relation to working hours. [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. The Code indicates: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. The 2021 Sustainability Report indicates: 'We conduct surveys on conflict materials using the CMRT and referring to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. In fiscal year 2021, we conducted our seventh annual survey on potential conflict minerals, and as a result, we were able to identify 236 RMAP conformant smelters, providing us confidence that 3TG sourced from these smelters were conflict-free'. However, it is not clear if these requirements are contractual. [CSR Related Policy, N/A: <a href="http://tel.com">tel.com</a>] &amp; [RBA Code of Conduct 7.0, 01/01/2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity</li> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Risk identification and disclosure in line with OECD Guidance: The webpage section Supply Chain Management indicates: 'We conduct surveys on conflict materials using the CMRT and referring to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'. However, no further description of the process found. Similar information is found in the 2021 Sustainability Report. [Supply Chain Management (web), N/A: <a href="http://tel.com">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Identification of smelter/refiners and OECD Guidance: It indicates: 'In fiscal year 2021, we conducted our seventh annual survey on potential conflict minerals, and as a result, we were able to identify 236 RMAP conformant smelters, providing us confidence that 3TG sourced from these smelters were conflict-free. In addition, none of the materials we procured were found to contain 3TG involved in conflict'. However, no further description of actual process followed to determine whether smelters/refiners have carried out due diligence in accordance with OECD (the process by which it determines the 236 RMAP conformance smelters). [Supply Chain Management (web), N/A: <a href="http://tel.com">tel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The 2021 Sustainability Report indicates: 'In fiscal year 2021, we conducted our seventh annual survey on potential conflict minerals, and as a result, we were able to identify 236 RMAP conformant smelters, providing us confidence that 3TG sourced from these smelters were conflict-free. In addition, none of the materials we procured were found to contain 3TG involved in conflict'. However, no evidence found that it publicly discloses the list of all the qualified smelters/refiners in its supply chain that it has independently judged to conform to the due diligence processes set out in the OECD Guidance with respect to at least 3TG. [Supply Chain Management (web), N/A: <a href="http://tel.com">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="http://tel.com">tel.com</a>]</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Reporting on responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes mineral risk management plan for supply chain: The webpage section Supply Chain Management indicates: ‘Our resolute goal is to eliminate the use of raw materials made from these conflict minerals, as well as any parts or components containing them’. However, it is not clear the how the Company evaluates and responds to identified risks in its mineral supply chain in order to prevent or mitigate adverse impacts in accordance with the OECD Guidance. Similar information is found in the 2021 Sustainability Report. [Supply Chain Management (web), N/A: <a href="#">tel.com</a>] &amp; [2021 Sustainability Report, 07/2021: <a href="#">tel.com</a>]</li> <li>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> <li>• Not Met: Disclose better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 12.00 out of 80 points scored in themes A-D has been applied to produce a score of 3.00 out of 20 points for theme E.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We

also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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