

Company Name Tokyo Electron
Industry ICT (Own operations and Supply Chain)
Overall Score (*) 19.7 out of 100

Theme Score	Out of	For Theme
3.1	10	A. Governance and Policies
3.7	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
2.8	20	D. Performance: Company Human Rights Practices
3.9	20	E. Performance: Responses to Serious Allegations
3.8	10	F. Transparency

(*) 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 2019 Methodology document. 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	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"> 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: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company indicates that "We have committed to respect human rights in line with the United Nations Guiding Principles on Business and Human Rights" However a commitment to respect the HR- in line- with UN Guiding Principles is not considered a formal commitment following CHRB wording criteria. [Human Rights Policy, 29/09/2017: tel.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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"> Met: UNGC principles 3-6: The Company indicates that "we became a signatory to the UN Global Compact in 2013". [Human Rights Policy, 29/09/2017: tel.com & Supply Chain Management, 09/05/2019: tel.com] Not met: Explicitly list ALL four ILO for ICT suppliers: The Company requires to suppliers compliance with applicable laws, social norms and the RBA Code of

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			<p>Conduct (the Company provides the RBA code of conduct document as the requirement for suppliers). The RBA code of conduct contains commitments non-discrimination, child labour, forced labour. In relation to freedom of association and collective bargaining the RBA Code states that "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". 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. [Procurement, 05/09/2019: tel.com & Supply Chain Management, 09/05/2019: tel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company is committed to each of "Freedom, equality & Non-Discrimination", "freely chosen employment: We have zero tolerance for child labor, forced labor, bonded labor and human trafficking"; "Freedom of Association: 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. " However, it is not clear the formal commitment to the Company to respect the right to collective bargaining. [Human Rights Policy, 29/09/2017: tel.com] • Met: Respect H&S of workers: The Company indicates that "Product Safety & 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." [Human Rights Policy, 29/09/2017: tel.com] • Met: H&S applies to ICT suppliers: The Company indicates that "We request that suppliers respect fundamental human rights, also prepare independent standards, and provide safe and healthy work environments." [Procurement Management, 09/05/2019: tel.com] • Met: working hours for workers: The Company's 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". [Human Rights Policy, 29/09/2017: tel.com] • Met: Working hours for ICT suppliers: The Company requires to suppliers compliance with applicable laws, social norms and the RBA Code of Conduct (the Company provides the RBA code of conduct document as the requirement for suppliers). In relation to working hours, it 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. Workers shall be allowed at least one day off every seven days". [Supply Chain Management, 09/05/2019: tel.com]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	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"> • Not met: Responsible mineral sourcing in conflict areas: The Company indicates that 'TEL regards taking action against conflict minerals (3TG) obtained through illegal exploitation, including sources with human rights violations or poor working conditions, an important part of corporate social responsibility. 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 if the commitment is extensive to minerals sourced from conflict affected and high risk areas. [Tokyo Electron Sustainability report, 07/2018: tel.com] • Met: Based on OECD Guidance: The Company indicates that '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'. [Procurement Management, 09/05/2019: tel.com] • Not met: Requires responsible mineral sourcing from suppliers: The Company indicates that 'We request that all suppliers work with us in dealing with conflict minerals'. Additionally, suppliers are surveyed on the RBA Code of Conduct. However, no evidence has been found of a requirement to suppliers to sourcing minerals responsibly from conflict affected and high risk areas based on OECD Guidance. [Procurement Management, 09/05/2019: tel.com & Supply Chain Management, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (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"> • Not met: Women's Rights: The Company has measures and initiatives to promote the role of women in different levels of the Company. Held a conference for Women Engineers and discloses the ratio of women in leadership roles among other things. 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.' However, no evidence found of a specific commitment to respect women's rights as established by international standards. [Tokyo Electron Sustainability report, 07/2018: tel.com & Human Rights Policy, 29/09/2017: tel.com] • Not met: Children's Rights: The Company prohibits child labor. In its Human Rights Policy and its Code of Ethics it states 'We have zero tolerance for child labor.' However, no evidence has been found of a specific commitment to respect children's rights as established by international standards. [Human Rights Policy, 29/09/2017: tel.com & The Code of Ethics of Tokyo Electron Group, 01/08/2016: tel.com] • Not met: Migrant worker's rights [The Code of Ethics of Tokyo Electron Group, 01/08/2016: tel.com & Human Rights Policy, 29/09/2017: tel.com] • Met: Expecting suppliers to respect these rights: The Company indicates that it requires its suppliers to comply with the RBA Code of Conduct Code. The RBA code contains the following commitment to migrant workers rights '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...and any other type of worker'. [Procurement Management, 09/05/2019: tel.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with 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"> • Met: Regular stakeholder engagement: On its website and its 2018 CSR report, the Company the Company discloses stakeholders including employees, suppliers and communities. It discloses key opinions and requests of each group. Also discloses specific engagement including conference for women engineers within the Company, and global engagement survey with employees. The Company reports outcomes of both examples. [Tokyo Electron Sustainability report, 07/2018: tel.com & Human Rights and Diversity, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company indicates that they will 'reflect the opinions and wishes of our stakeholders in business activities as we endeavor to improve our corporate value'. However, no evidence has been found of a commitment to engage with affected or potentially affected stakeholders in the development or monitoring of the human rights approach. [Tokyo Electron Sustainability report, 07/2018: tel.com & Human Rights and Diversity, 09/05/2019: tel.com] • Not met: Regular stakeholder design engagement
A.1.5	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"> • Not met: Commits to remedy: The Company indicates that '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'. In addition, on its website Management Foundation, section Grievance Mechanism, the Company states that it has 'constructed a framework for impact assessment and remediation, and is striving to establish an effective business-level grievance mechanism. To date, the company has established hotlines in Japan and overseas for employees and suppliers, and it continues to develop initiatives for grievance mechanism in-house and in the supply chain.' However, 'strive for' remediation and 'striving to establish' are not considered a formal commitment to remedy according CHRB wording criteria. This indicator looks for a statement of commitment to remedy adverse impacts that the Company has caused or contributed to. [Human Rights Policy, 29/09/2017: tel.com & Management Foundation, 09/05/2019: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company's human rights policy commitments are approved by Representative Director, President & CEO Dashiki Kawai. [Human Rights Policy, 29/09/2017: tel.com] • Met: Board level responsibility for HRs: In its Corporate Governance Guidelines the Company states 'TEL has established the Code of Ethics of the Tokyo Electron Group and makes efforts to ensure all employees are familiar with this. Moreover, TEL appoints a Chief Business Ethics Director from among Corporate Directors who is responsible for ethics and has established an ethics committee as a steering organization for promoting corporate ethics throughout TEL.' The CSR Promotion Network also states that the CSR Management Council is made up of Chairman, Representative Director, President and CEO, Directors and Managers. The Code of ethics contains the Company's commitments to respect human rights. [Tokyo Electron Sustainability report, 07/2018: tel.com & The Code of Ethics of Tokyo Electron Group, 01/08/2016: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: The Senior Vice President and General Manager, Global Strategy President and Managing Director of Tokyo Electron Europe Ltd has a public statement indicating the approach to HR of the Company: ". Our European operation in line with our global standards is committed to pursuing socially responsible practices and advocating respect for human rights in our operation and in our supply chains with a continuous improvement approach." However, no evidence found of board member making a speech or presentation setting out the Company's approach to human rights. [Management Foundation, 09/05/2019: tel.com]
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review of salient HRs: In its Corporate Governance Guidelines the Company states 'TEL has established the Code of Ethics of the Tokyo Electron Group and makes efforts to ensure all employees are familiar with this. Moreover, TEL appoints a Chief Business Ethics Director from among Corporate Directors who is responsible for ethics and has established an ethics committee as a steering organization for promoting corporate ethics throughout TEL.' The CSR Promotion Network also states that the CSR Management Council is made up of Chairman, Representative Director, President and CEO, Directors and Managers and that they meet twice a year to 'Decide company-wide CSR policy' and 'Discuss important matters'. [Tokyo Electron Corporate Governance Guidelines, 27/06/2019: tel.com & TEL's CSR, 09/05/2019: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: No evidence found. [Human Rights Policy, 29/09/2017: tel.com] • Not met: At least one key ICT HR risk, beyond employee H&S: In its Human Rights Policy the Company states '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.' However, there is no evidence where the Company indicates that at least one Board member has an incentive or performance management scheme linked to an aspect of the Company's human rights policy commitment(s). [Human Rights Policy, 29/09/2017: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public: Although the Company has made its performance in Human Rights issues in 2018 and 2019 public in the Sustainability Report (CSR goals and results) there is no evidence of the criteria linking Board remuneration to human rights performance is made public. [Tokyo Electron Sustainability report, 07/2018: tel.com & CSR goals and results -page 11-12 of Sustainability Report, 07/2018: tel.com]

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	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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Senior responsibility for HR: The Company shows a chart with all Directors, Audit & Supervisory Board Members and Executive Officers, and a description of their positions. However, this indicator looks for the senior position (not Supervisory Board member, but senior management) in charge of overseeing human rights issues. [ANNUAL REPORT 2018, 2018: search.tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: The Company states that the Ethical Committee meets twice a year. In its feedback the Company also states that 'We discuss day-to-day Human Rights issues and activities at our Ethical Committee held twice a year.' However, this would not be any evidence for this data point. This indicator looks for an indication of how day-to-day responsibility is allocated across the range of relevant functions of the Company. [Tokyo Electron Corporate Governance Guidelines, 27/06/2019: tel.com] • Not met: Day-to-day responsibility for ICT in supply chain: The Company states that it conducts annual surveys of its suppliers related to Human Rights, 'namely child labor, forced labor, bonded labor, inhumane treatment, false reports, falsification of records, or bribery.' However, no evidence found of a description by the Company of how day-to-day responsibility for managing human rights issues with its suppliers is allocated. [Supply Chain Management, 09/05/2019: tel.com]
B.1.2	Incentives and performance 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"> • Not met: Senior manager incentives for human rights • Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
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"> • Not met: HR risks is integrated as part of enterprise risk system: The Company indicates "We will establish assessment and remediation processes for dealing practically with human rights issues, such as identifying and assessing human rights risks and impacts, responding to those risks and impacts, and reviewing the effectiveness of those responses" However, no further evidence has been found about this statement and no proof has been find of the assessment being integrated in a broader enterprise risk management system. The Company also states in its Corporate Governance Guidelines that it has a risk management system which involves 'Reporting on the status of risk management activities to Audit & Supervisory Board Members and the Board of Directors on a regular basis'. However, there is no evidence in regards to human rights. [Tokyo Electron Sustainability report, 07/2018: tel.com & Tokyo Electron Corporate Governance Guidelines, 27/06/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own 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"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Company indicates that 'In March 2018, we also implemented a human rights e-learning program targeting all TEL executives and employees in an effort to facilitate communication on the basic principles and initiatives related to respect for human rights'. However, no evidence has been found that this communication process is available in local languages when necessary. On its website the Company states 'In fiscal year 2019, TEL also implemented a human rights e-learning program targeting

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>all TEL executives and employees'. The Company provided additional comment in feedback, although it was not found in public sources. Training covering all employees, assumed to include local languages. [Tokyo Electron Sustainability report, 07/2018: tel.com & Related Policy, 09/05/2019: tel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to 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"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Requiring ICT suppliers to communicate policy down the chain: On its website section 'Supply Chain Management', the Company indicates: 'Our endeavours also included strengthening partnerships by providing training programs on the RBA code of conduct and confirming supplier agreement.' The RBA Code of Conduct requires: 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org & Supply Chain Management, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: In its website section 'Procurement Management', the Company indicates: 'In addition to complying with the following matters, we ask our suppliers to observe the applicable laws and social norms in the countries and regions where they engage in business, as well as the RBA Code of Conduct.' However, it is not clear whether the request is included in its Procurement Agreement. [Procurement Management, 09/05/2019: tel.com] • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	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"> • Not met: Scores at least 1 on A.1.2: See A.1.2 • Met: Trains all workers on HR policy commitments: The Company indicates that 'In March 2018, we also implemented a human rights e-learning program targeting all TEL executives and employees in an effort to facilitate communication on the basic principles and initiatives related to respect for human rights" The Company also states on the website Management Foundation: 'In fiscal year 2019, TEL also implemented a human rights e-learning program targeting all TEL executives and employees.' [Tokyo Electron Sustainability report, 07/2018: tel.com & Management Foundation, 09/05/2019: tel.com] • Not met: Trains relevant ICT managers including procurement: The Company indicates that 'In March 2018, we also implemented a human rights e-learning program targeting all TEL executives and employees in an effort to facilitate communication on the basic principles and initiatives related to respect for human rights'. On its website 'Related Policy' 'Human Rights Policy' under 'Communication & Training' 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 group. In addition, we believe it is essential for our business partners to conduct their business activities with respect for human rights.' However, no evidence found in relation to relevant managers and workers receiving specific human rights training relevant to their role (including at least procurement). [Tokyo Electron Sustainability report, 07/2018: tel.com & Related Policy, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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"> • Not met: Scores at least 1 on A.1.2: See A.1.2. • Met: Monitoring implementation of HR policy commitments: In its Human Rights Transparency Statement, the Company states the following: 'We use the RBA assessment tool to measure our effectiveness. We have zero tolerance for child labour, forced labour, bonded labour and human trafficking, and the tool is in line with this. According to the result of the assessment in 2018, we have not found any evidence of any of these within our major operations. [Human Rights Transparency Statement, 30/06/2018: tel.com] • Met: Monitoring ICT suppliers: The Company indicates in its website the following: 'With an aim of keeping track of its suppliers' engagement in CSR activities, TEL has conducted a CSR Survey since fiscal year 2014. The survey we conduct is in accordance with the RBA code of conduct. We analyze the responses

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and provide feedback to suppliers in an effort to build on improvements.' [Supply Chain Management, 09/05/2019: tel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company indicates on its website Supply Chain Management: 'We analyze the responses and provide feedback to suppliers in an effort to build on improvements. [...] No suppliers were engaged in any of the practices given particular emphasis in the RBA code of conduct, namely child labor, forced labor, bonded labor, inhumane treatment, false reports, falsification of records, or bribery. ' In addition, on the website Management Foundation, section Impact Assessment and Remediation (Human Rights Due Diligence) the Company states 'TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required. By continuing the impact assessment and remediation process in the future, the company will eliminate medium- to long-term human rights risks, leading to the creation of opportunities. However, no further evidence found, including the corrective action process nor the number of incidents. [Supply Chain Management, 09/05/2019: tel.com & Management Foundation, 09/05/2019: tel.com] • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored: The Company indicates that 'During fiscal year 2018, we surveyed key suppliers accounting for more than 80% of our procurement spend.' However, it is not clear the proportion of its supply chain monitored. [Supply Chain Management, 09/05/2019: tel.com]
B.1.7	Engaging business relationships	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"> • Met: HR affects ICT selection of suppliers: The Company indicates in its website that: '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 Communication, 09/05/2019: tel.com] • Not met: HR affects on-going ICT supplier relationships: In addition to the above the Company states: '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.' Further, in the section 'CSR Procurement' the Company states: 'TEL is committed to building and maintaining a robust and sustainable supply chain. In addition to sharing our Procurement Policy, Procurement Policy–Supplement, RBA Code of Conduct, and Guideline for Green Procurement, we also promote CSR activities with suppliers. Our promotion includes respect for fundamental human rights, strict compliance with labor laws and regulations, and reduction of environmental impact. With an aim of keeping track of its suppliers' engagement in CSR activities, TEL has conducted a CSR Survey since fiscal year 2014. The survey we conduct is in accordance with the RBA code of conduct. We analyze the responses and provide feedback to suppliers in an effort to build on improvements.'. However, there is no description of decisions to renew, expand or terminate business relationships in case of violations of human rights. [Supply Chain Communication, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance
B.1.8	Approach to engagement with potentially 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"> • Not met: Stakeholder process or systems: The Company discloses a chart with all the relevant stakeholders the company maintains communications, including workers, local communities, governments or suppliers. Consecutively explains the different steps it takes to identify the social issues and then sets targets or implement different projects. However, no evidence found in relation to how it identifies affected stakeholders relevant for engagement, and evidence of engagement in human rights issues in last two years. [Tokyo Electron Sustainability report, 07/2018: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement: On the website and CSR report, the Company states 'TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required'. However, this evidence seems to refer to risk and compliance monitoring, not engaging in dialogue. In addition, the CSR report has a table with a list of stakeholders, communication opportunities with them and key opinions and requests from them. However, none of this seems to include human rights issues. There is a 'globally engagement survey' with employees which 'aims to enhance employee work satisfaction and motivation, achieving growth for both the company and its employees. Questions on issues such as pride in the Company and work, and awareness and evaluation of the work environment help us to grasp the current situation'. It is not clear, however, the frequency. [Management Foundation, 09/05/2019: tel.com & Identifying Material Issues, 09/05/2019: tel.com] • Not met: Workers in ICT SC engaged: On the website Management Foundation, section 'Impact Assessment and Remediation (Human Rights Due Diligence) the Company states 'TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. [...] for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required.' However, it is not clear in how far the workers/employees amongst the Company's extractive business partners are involved. [Management Foundation, 09/05/2019: tel.com] • Not met: Communities in the ICT SC engaged: No evidence found. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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"> • Met: Identifying risks in own operations: On its website Management Foundation, section Impact Assessment and Remediation (Human Rights Due Diligence) the Company states 'TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required'. [Tokyo Electron Sustainability report, 07/2018: tel.com & Management Foundation, 09/05/2019: tel.com] • Met: Identifying risks in ICT suppliers: On its website Management Foundation, section Impact Assessment and Remediation (Human Rights Due Diligence) the Company states 'TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required'. [Management Foundation, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As indicated, the process is carried out every year. [Management Foundation, 09/05/2019: tel.com] • Met: In consultation with stakeholders: As indicated above, the process is carried out by consulting with suppliers and employees through surveys and questionnaires. [Management Foundation, 09/05/2019: tel.com] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and	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"> • Not met: Salient risk assessment (and context): On its website Management Foundation, Impact Assessment and Remediation (Human Rights Due Diligence)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	impacts identified (salient risks and key industry risks)		<p>the Company states that it is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. However, this seems to be a work in progress, no further details found. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. However, this annual process seems to refer to monitor compliance with company's requirements, rather than a process to determine which are the salient issues. In addition, to award the indicator, evidence is needed of factors taken into account, including at least one of social, geographical, economical, etc. [Management Foundation, 09/05/2019: tel.com]</p> <ul style="list-style-type: none"> • Not met: Public disclosure of salient risks: The Company discloses a list with what consider to be it salient risk in Corporate Social Responsibility, this includes: responsiveness to customers or its people and workplaces among others. However, no specific disclosure of a list with what considers to be its salient HR risks has been found. [Tokyo Electron Sustainability report, 07/2018: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> • Not met: Action Plans to mitigate risks: The Company indicates that '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, this refers to future intentions. No evidence found of a implemented system to implement action plans to mitigate the human rights risk the Company faces. In addition, on its website Management Foundation, Impact Assessment and Remediation (Human Rights Due Diligence) the Company states that TEL is currently identifying and evaluating risks and impacts relating to human rights and, based on the results, is promoting corrective action aimed at eliminating those risks. However, no further details found. Within the company, it utilizes self-assessment questionnaire (SAQ) based on the RBA Code of Conduct and, for suppliers conducts a CSR survey in order to evaluate human rights risks throughout the value chain. It analyzes and evaluates the results of these surveys conducted once per year, and implements corrective action as required.' However, this seems to refer to monitoring compliance, rather than wider actions to prevent or mitigate the different human rights risks and impacts that it faces. [Human Rights Policy, 29/09/2017: tel.com & Management Foundation, 09/05/2019: tel.com] • Not met: Including in ICT supply chain • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating 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"> • Not met: System to check if Actions are effective: No evidence found in any of the two sources above (provided in the Company's feedback) for the system(s) for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [GRI Guidelines Table, 09/05/2019: tel.com & Identifying Material Issues, 09/05/2019: tel.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% 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	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"> • Met: Channel accessible to all workers: The Company indicates that “The Tokyo Electron Group has an internal reporting system that employees can use to report any activity suspected of being in breach of laws, regulations or business ethics. An ethics hotline and a compliance hotline have been established to receive reports from all Group companies, and each overseas location also has its own reporting system.” In addition, on its website Management Foundation, section Compliance, Internal Reporting System, the Company makes a similar statement saying: ‘As a means for employees to provide information outside the chain of command about behavior that may be in violation of laws or corporate ethics, we have established a hotline (organized around the tenets of confidentiality, anonymity, and prohibition of retribution) to receive internal reports. In addition, we established an external contact point for employees and another contact point specifically for suppliers and third parties. Each overseas location has its own internal reporting hotline, and we are building a unified internal reporting system for all overseas bases.’ [Compliance/Code of Ethics, 09/05/2019: tel.com & Management Foundation, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company indicates that “There were no reports or cases of non-compliance with laws, regulations, or principles of ethics in fiscal 2017 that could have had a material impact on the Group’s business or local communities.” However, no evidence has been found of a disclosure of the total number of complaints filed, addressed or resolved. [Compliance/Code of Ethics, 09/05/2019: tel.com] • Not met: Channel is available in all appropriate languages: The Company indicates that “an ethics hotline and a compliance hotline have been established to receive reports from all Group companies, and each overseas location also has its own reporting system.” No details found however, on channels being available in all appropriate languages. [Compliance/Code of Ethics, 09/05/2019: tel.com & Management Foundation, 09/05/2019: tel.com] • Met: Expect ICT supplier to have equivalent grievance systems: The RBA Code of Conduct requires an 'effective grievance mechanism, to assess employees’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Met: Opens own system to ICT supplier workers: In addition to hotline for employees, the Company indicates that 'we have established an external contact point for employees and another contact point specifically for suppliers and third parties. Each overseas location has its own internal reporting hotline'. [Tokyo Electron Corporate Governance Guidelines, 21/12/2018: search.tel.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> • Met: Grievance mechanism for community: The Company states on its website Management Foundation under 'Compliance', 'Internal Reporting System': 'As a means for employees to provide information outside the chain of command about behavior that may be in violation of laws or corporate ethics, we have established a hotline (organized around the tenets of confidentiality, anonymity, and prohibition of retribution) to receive internal reports. In addition, we established an external contact point for employees and another contact point specifically for suppliers and third parties'. [Management Foundation, 09/05/2019: tel.com & Supplier Hotline, 09/05/2019: secure.tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Although the Channel is available online, it is not clear if its available in all appropriate languages. [Supplier Hotline, 09/05/2019: secure.tel.com] • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system: The Company allows external third parties to file complaints, however, it seems that is restricted to report in relation to the Company alone, and not about its business relationships: 'If you find a compliance violating actions (including suspected doubt) of our employee in connection with the transactions with Tokyo Electron Group, please inform us by using this form'. [Supplier Hotline, 09/05/2019: secure.tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: The Company states 'If you find a compliance violating action (including suspected doubt) of our employee in connection with the transactions with Tokyo Electron Group, please inform us by using this form.' followed by an explanation how the data will be used. No evidence found in relation to response timescales in the internal reporting system either. [Supplier Hotline, 09/05/2019: secure.tel.com & Management Foundation, 09/05/2019: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: How complainants will be informed • Not met: Who is handling the complaint Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The company indicates on its website, Management Foundation, 'Compliance', 'Internal Reporting System' the Company states: 'As a means for employees to provide information outside the chain of command about behavior that may be in violation of laws or corporate ethics, we have established a hotline (organized around the tenets of confidentiality, anonymity, and prohibition of retribution) to receive internal reports. In addition, we established an external contact point for employees and another contact point specifically for suppliers and third parties.' No evidence found of prohibition of retaliation against other stakeholders (including those that represent them) for raising human rights related complaints or concerns. [Supplier Hotline, 09/05/2019: secure.tel.com & Management Foundation, 09/05/2019: tel.com] • Met: Practical measures to prevent retaliation: The Company indicates that 'In all instances, the system ensures that whistle-blowers remain anonymous and are protected from any disadvantage or repercussions'. [Compliance/Code of Ethics, 09/05/2019: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects ICT suppliers to prohibit retaliation: The RBA Code of Conducts indicates: 'Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.' However, the grievance channel required does not include external stakeholders. It also states in its Human Rights Policy 'we believe it is essential for our business partners to conduct their business activities with respect for human rights. For that reason, we require our business partners to comply with not only laws and regulations in the countries and regions they operate but also with the RBA Code of Conduct to which we refer.' However, 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 6.0, 01/2018: responsiblebusiness.org & Human Rights Policy, 29/09/2017: tel.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company indicates that they '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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business relationships'. In addition, on its website Management Foundation, section 'Grievance Mechanism' the Company states 'TEL has constructed a framework for impact assessment and remediation, and is striving to establish an effective business-level grievance mechanism. To date, the company has established hotlines in Japan and overseas for employees and suppliers, and it continues to develop initiatives for grievance mechanism in-house and in the supply chain.' However, no evidence has been found of a description of the approach the Company has taken or would take when providing remedy for adverse human rights that it has caused or contributed to. [Human Rights Policy, 29/09/2017: tel.com & Management Foundation, 09/05/2019: tel.com]</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% 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"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined: The Company indicates "Remuneration system: 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)" However, no evidence has been found of a description of how the Company determines what living wages should be (including the use of trade unions). [Work-life Balance, 09/05/2019: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
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"> • Not met: Living wage in supplier code or contracts: On its website Procurement Management the Company states: 'Compliance with Applicable Laws, Social Norms, and the RBA Code of Conduct: 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.' The RBA Code of Conduct states 'Wages and Benefits: Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, there is no evidence for living wage requirements in the Company's contractual arrangements with its suppliers or its supplier code of conduct. Living wage does not equal minimum wage. Living wage is a wage that is high enough to maintain a normal standard of living. In addition, in its feedback the Company also states 'Every year we confirm Wages situation in our CSR survey.' and 'There is also Minimum Wages Law that suppliers need to obey in Japan.' No source was provided to prove these statements. No evidence for this data point. [Procurement Management, 09/05/2019: tel.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with 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"> • Met: Avoids business model pressure on HRs: The Company indicates that 'TEL must not use this dominant position to unfairly harm the interests of suppliers. Conduct such as cutting prices unfairly, delaying payment, unreasonably refusing to accept or return goods ordered, and forcing suppliers to purchase products specified by TEL is strictly prohibited'. [The Code of Ethics of Tokyo Electron Group, 01/08/2016: tel.com & Management Foundation, 09/05/2019: tel.com] • Not met: Positive incentives to respect human rights: The Company states that 'With an aim of keeping track of its suppliers' engagement in CSR activities, TEL has conducted a CSR Survey since fiscal year 2014. The survey is in accordance with the RBA code of conduct'. However, no evidence found of specific positive incentives it puts into place via its purchasing practices to encourage its suppliers to respect human rights (e.g. price premiums, repeat business, increased orders or longer contracts with good performers). [Management Foundation, 09/05/2019: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to product source: The Company indicates on its website Supply Chain Management that as consequence of making the annual survey on countries of origin and smelters of potential conflict minerals they have identified 249 smelters they work with conformant with the responsible mineral initiatives. However, no evidence has been found of a commitment to identify all the Company suppliers including all direct and indirect suppliers, not only responsible smelters. In addition, on its website Management Foundation in the section "Procurement Initiatives - "Procurement BCP" the Company states: 'As part of its Business continuity plans(BCP), TEL collaborates with suppliers for disaster preparation. The company maintains a database of suppliers' production sites so that if a crisis arises, it can promptly identify impacted suppliers and quickly collaborate in recovery efforts. During fiscal year 2019, about 18,000 supplier sites were registered, and post-disaster impact surveys were conducted seven times. In addition, for key suppliers accounting for more than 80% of the TEL's procurement spend, it conducts a BCP survey, analyzes their responses, and gives the results to suppliers as feedback to promote further improvement. In the fiscal year 2019 survey, improvements in overall rating level were observed at 19% of suppliers and improvements in the overall raw score were seen at 42%.' However, it is not clear if this also includes indirect suppliers (including components). [Supply Chain Management, 09/05/2019: tel.com & Management Foundation, 09/05/2019: tel.com] Score 2 • Not met: Discloses significant parts of supply chain and why
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Does not use child labour: The Company indicates that 'Tokyo Electron Group does not use forced labor or child labor'. [The Code of Ethics of Tokyo Electron Group, 01/08/2016: tel.com] • Not met: Age verification of job applicants and workers: On its website Management Foundation, section Grievance Mechanism the Company states that is 'has constructed a framework for impact assessment and remediation, and is striving to establish an effective business-level grievance mechanism. To date, the company has established hotlines in Japan and overseas for employees and suppliers, and it continues to develop initiatives for grievance mechanism in-house and in the supply chain.' However, there is no evidence 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. In addition, the Company states in its feedback 'We conduct SAQ (Self Assessment Questionnaire) every year to confirm that there is no child labor in our operations worldwide. Upon hiring new employees, we verify the age of them with an official recruitment documents.' No evidence found that support this. [Management Foundation, 09/05/2019: tel.com] Score 2 • Not met: Remediation if children identified: See above
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Child Labour rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct includes under section '2) Young Workers' a whole paragraph on the prohibition of child labor and indicates: 'Child labor is not to be used in any stage of manufacturing.' In addition, on the website Procurement Management the Company states: 'In addition to complying with the following matters, we ask our suppliers to observe the applicable laws and social norms in the countries and regions where they engage in business, as well as the RBA Code of Conduct: •Compliance with prohibition of child labor, and forced labor, and with other labor-related laws and regulations.' On the website Management Foundation, section CSR Procurement the Company states that 'according the survey results, no suppliers were engaged in any of the practices given particular emphasis in the RBA code of conduct, namely child labor, forced labor, bonded labor...'. However, in none of the sources there is a requirement to verify the age of job applicants and workers and to implement remediation programmes. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org & Procurement Management, 09/05/2019: tel.com] • Not met: How working with suppliers on child labour

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time: The Company indicates that they have zero tolerance for forced labor, bonded labor and human trafficking. However, no evidence has been found of a commitment to not require workers to pay work related fees or costs and to pay them in full and on time. [Human Rights Policy, 29/09/2017: tel.com] • Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] Workers shall not be required to pay employers' or 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.' [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org & Procurement Management, 09/05/2019: tel.com] • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct 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.[...] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org & Procurement Management, 09/05/2019: tel.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and 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: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct 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'. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: 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 (0.38) and the lost time incident rate LTIR (0.77) [Tokyo Electron Sustainability report, 07/2018: tel.com] • Met: Lost days or near miss disclosure: See above. Score 2 <ul style="list-style-type: none"> • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The company indicates that their goal for this year was to Ensure that the number of workplace injuries per 200,000 work hours (the total case incident rate) is less than 0.5. [Tokyo Electron Sustainability report, 07/2018: tel.com] • Met: Met targets or explains why not: As indicated above the Company indicates that has met the target for the last year. (0.38) [Tokyo Electron Sustainability report, 07/2018: tel.com]
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: The Company indicates that they are implementing e-learning mechanisms concerning matters including power, sexual and maternity harassment. The Company also has set a target to double the number of women in management roles in 3 years and is making efforts towards the empowerment of women. In its Human Rights Policy the Company states that it has 'zero tolerance for any type of harassment in any work-related circumstance.' In its Code of Ethics the Company states: 'Sexual harassment generally entails harassment of a woman by a man, but also includes harassment of a man by a woman.' and 'TEL respects all human rights [...] and does not discriminate on the basis of gender....' However, no details found on process to prohibit harassment. [Tokyo Electron Sustainability report, 07/2018: tel.com & Human Rights Policy, 29/09/2017: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: Working conditions take account of gender

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Equality of opportunity at all levels Score 2 <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition 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, as well as include reasonable accommodations for nursing mothers.' However, there is no reference to pay equal pay for equal work or measures to ensure equal opportunities throughout all levels of employment . [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on women's rights • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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'. However, no reference found to International standards, ILO conventions, or standard weekly hours. [Human Rights Policy, 29/09/2017: tel.com] Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct 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, no evidence found of references to international standards, ILO conventions or standard weekly hours. [RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on working hours • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing due diligence in supplier contracts: The Company's procurement policy disclosed on the website states that 'we request that all suppliers work with us in dealing with conflict minerals'. The Company asks suppliers to comply with the RBA code and is part of the procurement policy. The RBA Code establishes that 'Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request'. However, no evidence found of the Company requiring suppliers in contracts or agreements to carry out due diligence in accordance with the OECD Guidance, covering all conflict affected and high risk areas, beyond DRC and adjoining countries, and these being part of contractual agreements. [Procurement Management, 09/05/2019: tel.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] • Not met: Builds capacity with smelters/refiners: The Company conducts annual surveys using the CMRT. However, no description of how the Company works with suppliers and smelters to build capacity could be found, [Management Foundation, 09/05/2019: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Disclosure of smelter information in supplier requirements: See above. RBA code requires to make due diligence measures available to customers upon customer request. However, as indicated above, no evidence found of this being part of contracts or commercial agreements. [Procurement Management, 09/05/2019: tel.com & RBA Code of Conduct 6.0, 01/2018: responsiblebusiness.org] Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification 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"> Not met: Risk identification and disclosure in line with OECD Guidance Not met: Identification of smelter/refiners and OECD due diligence: The Company indicates that 'we conducted our fourth annual survey on countries of origin and smelters of potential conflict minerals, using the reporting template (CMRT) developed by the RMI. As a result, we identified 249 RMAP conformant smelters, providing us confidence that 3TG sourced from these smelters were conflict-free. None of the materials procured were found to contain conflict-affected 3TG'. No evidence found, however, of a description of the process followed to assess whether smelters/refiners have carried out due diligence processes covered by OECD Guidance. [Procurement Management, 09/05/2019: tel.com & Tokyo Electron Sustainability report, 07/2018: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses smelters/refiners judged in line with OECD due diligence: 'In fiscal year 2019, TEL conducted its fifth annual survey on countries of origin and smelters of potential conflict minerals, using the reporting template (CMRT*2) developed by the RMI*3. As a result, TEL identified 253 RMAP*4 conformant smelters, providing the company confidence that 3TG sourced from these smelters were conflict-free. None of the materials procured were found to contain conflict-affected 3TG.' However, no list of smelters could be found. [Management Foundation, 09/05/2019: tel.com] Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the 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"> Not met: Describes mineral risk management plan for supply chain: 'TEL regards taking action against conflict minerals (3TG*1) obtained through illegal exploitation, including sources with human rights violations or poor working conditions, an important part of corporate social responsibility. The company's 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, no details of actions to mitigate risks could be found. [Management Foundation, 09/05/2019: tel.com] Not met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> Not met: Supplier and stakeholders engaged in risk management strategy Not met: Responsible conflict mineral sourcing covers all minerals

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 15.79 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.95 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.77 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Tokyo Electron made data public that met one or more elements of the methodology in 23 cases, leading to a disclosure score of 1.77 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: Company reports on GRI: The company reports against the GRI index. [GRI Guidelines Table, 09/05/2019: tel.com]
F.3	Key, High Quality Disclosures	0 out of 4	Tokyo Electron met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

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

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As CHRB Ltd, 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.