

## Policy Statement on the Human Rights Strategy of Advantest Europe GmbH

### Commitment to respect for human rights

We are aware of our corporate responsibility to respect human rights. We are therefore committed to respecting human rights in our business activities and our global supply and value chains and to providing access to remedies for those affected by human rights violations.

We base our business activities and our commitment to upholding and respecting human rights on the following principles of social responsibility and human rights:

- The United Nations Guiding Principles on Business and Human Rights.
- The United Nations Universal Declaration of Human Rights as well as the Civil and Social Covenants, which define the civil, political, and social rights to which all people are entitled for the sake of their dignity.
- The core labor standards of the International Labor Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced and child labor, and the prohibition of discrimination in respect of employment and occupation.

As we are committed to protecting the environment, we also adhere to the following international guidelines:

- Minamata Convention on Mercury of October 10, 2013.
- Stockholm Convention of May 23 on persistent organic pollutants.
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989.

Furthermore, in our Code of Conduct [The Advantest Way](#), we have laid down our principles with regard to human and environmental rights. Every individual at Advantest is encouraged to put these principles into practice. Our corporate culture is based on integrity and respect.

We expect our business partners to also commit to respecting human rights, establishing appropriate due diligence processes, and passing these expectations on to their suppliers.

Advantest is committed to protecting the environment and preserving this natural basis of life for future generations as a prerequisite for human rights.

### Principles of human rights and environmental strategy

We commit to respecting and complying with the following ethical standards fully:

(1) We strictly comply with all national laws and regulations and refrain from acting in any way that disrupts society. In addition, we work to establish in-house rules to ensure compliance with all applicable

laws and regulations, actively collect information on said laws and regulations, and use education and training to ensure complete compliance with the same.

(2) We contribute to local society by taking an interactive, communicative role.

(3) We convey our ethical standards to companies with which we do business and work to help them understand our policies and, hopefully, implement similar activities.

We are also committed to protecting human rights in our work processes, supply chains, and in our own companies. This includes:

(1) We respect every individual and do not discriminate based on race, gender, age, nationality, religion, social origin, physical disability, medical condition, or sexual orientation.

(2) We employ only people who meet the legal age standards for labor, and we are not involved in forced labor, slave labor, or human trafficking.

(3) We build a strong relationship of trust and collaboration through open communication among employees and management. We respect basic labor rights such as freedom of association, the right to organize, and the right to collective bargaining.

(4) We maintain a comfortable working environment and support health, safety, and sound development practices.

(5) We do not tolerate any behavior that hurts the dignity of the individual, whether through words and actions, violence, sexual harassment, power harassment, or mental abuse.

(6) We respect personal privacy.

(7) We abide by all ordinances and corporate regulations regarding the handling of personal information and take precautions to prevent the leakage and/or unauthorized use of that information.

### **Risk analysis**

We have carried out a risk analysis to identify human rights and environmental risks arising from our business activities. As part of the risk analysis, the identified risks relating to human rights and the environment are assessed appropriately.

For our business division and suppliers, we identify potential abstract and concrete risks using external and internal data sources, which we use to determine country and product group risks with regard to our suppliers and business purpose-specific risks with regard to our business division.

In the abstract risk analysis, country and sector-specific data are collected as probability indicators for each of the human rights and environmental risk areas specified in the Supply Chain Due Diligence Act. These indicators are then used to develop a risk score for all respective risk areas.

In the next step, the company's business areas and suppliers with identified high risks are analyzed in more detail as part of the concrete risk analysis, and a concrete assessment of the risk values is created using research and expert opinions (to confirm or adjust the risk assessment from the abstract risk analysis).

We ensure that risks are prioritized and appropriately weighted. In doing so, we take into account the nature and scope of Advantest's business activities, the influence we have on the originator of risks, the typical severity of a breach of duty, and the probability of a breach of duty occurring.

### **Relevant human rights and environmental issues and potentially affected groups of people**

As a technology company with production and global supply relationships, we recognize that our business activities and our global supply and value chains have the potential to cause adverse impacts on human rights.

We are committed to respecting all internationally recognized human rights and focus our human rights due diligence processes in particular on the following human rights issues that we have identified as material for our company through the risk analysis.

This applies to our employees and employees of direct suppliers (especially in third countries) concerning the following topics:

- Right to health and safety at work.
- Right to freedom of association.
- Ban on forced labor.

This also affects residents concerning the following issues:

- Prohibition of the handling, collection, storage, disposal, import, and export of waste.
- Prohibition of causing harmful soil change, water pollution, air pollution, harmful noise emissions, or excessive water consumption.
- The ban on unlawful forced eviction and the ban on unlawful appropriation of land.

### **Risk management**

We implement risk management in all relevant business processes at Advantest through appropriate measures. The aim is to reduce and prevent violations through appropriate measures. These measures include control mechanisms and reporting obligations.

We have defined clear responsibilities for the exercise of and compliance with our human rights due diligence obligations. At the highest management level, the Managing Director for EHS and Sustainability is responsible for respecting human rights. Decisions are made on the basis of regular and ad hoc internal reporting by the Human Rights Officer on human rights-relevant findings from our risk analysis, information from our complaints system, and information on the effectiveness of our preventive and remedial measures.

We investigate every indication of human rights violations and monitor the effectiveness of our training and development measures in this regard.

### **Preventive and remedial measures**

Identified risks and (impending) violations are minimized through preventive and remedial measures that affect both the entire company and Advantest's suppliers after prioritization. The preventive and remedial measures are assessed for appropriateness and effectiveness based on the results of our annual and event-driven risk analysis.

Immediate risks and (impending) violations for people and the environment in the supply chain are eliminated by immediately implementing measures. In the event of serious and immediate risks to people and the environment, we work with the direct supplier to develop an action plan to reduce or eliminate the risk or violation. To manage and reduce the risk of human rights violations and environmental risks in our supply chain, we require our suppliers to contractually commit to ethical standards of conduct in their dealings with their employees and suppliers. In cases that we deem appropriate, suppliers must provide risk assessment information and conduct training and audits on the requirements of the Supply Chain Due Diligence Act. If the action plans developed are not implemented or do not lead to the agreed objective, we reserve the right to terminate the business relationship with the direct supplier. When selecting our suppliers, we also pay attention to compliance with human rights and environmental protection targets as well as preventive measures to protect human rights and the environment.

If preventive and remedial measures do not adequately address the risks, we will adapt our processes or measures.

### **Whistleblower system**

In order to effectively prevent and remedy human rights and environmental violations, appropriate complaints management is an important part of our due diligence processes. We have therefore established a [whistleblower system](#) that offers all whistleblowers the opportunity to submit complaints about violations in several languages. Possible violations of human rights can be reported anonymously via the whistleblower portal. The confidentiality and anonymity of whistleblowers are guaranteed. The information provided by whistleblowers also helps us to continuously improve our human rights and environmental due diligence. We review the effectiveness of the whistleblowing system once a year and on an ad hoc basis.

The specific procedure is described in detail in the whistleblower system. We are committed to investigating any reported violations and suspected cases, taking appropriate remedial and preventive measures, and imposing appropriate sanctions.

### **Documentation and reporting obligations**

Risks, measures, and their effectiveness are documented and evaluated in an annual report to the management, key decision-makers, and relevant authorities.

This report is made publicly available free of charge on our website for seven years and sent to the responsible authority by the deadline. In addition, we review the appropriateness of all the measures described at least once a year and on an ad hoc basis and develop them further.

Due diligence measures are documented on an ongoing basis and retained for at least seven years from the date of preparation. In addition, we prepare an annual report in which we present the fulfillment of our due diligence obligations in the past year. This report is published on the Advantest website within four months of the end of the financial year.

This policy statement comes into force on January 1, 2024. We review this declaration regularly and will adapt it in the event of changed risks or new requirements.

Munich, December 31, 2023

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