EBARA TECHNOLOGIES, INCORPORATED

51 Main Avenue
Sacramento CA 95838 U.S.A.

To all ETI,

Re: Our ETI Compliance Program

We, EBARA Technologies, Inc. (ETI), have committed our Public declaration regarding our Compliance:

Declaration of Compliance

To be a good corporate citizen who is trusted by all stakeholders. We, EBARA Technologies, Inc., declare that we will comply with any Internal and Other rules, including but not limited to any Laws and Regulations, and to take any actions in good faith and in accordance with social norms, common sense and decency. The Company places the highest priority on ensuring our employee's mental and physical health and safety. We do not engage in power harassment, sexual harassment, or any other acts that violate human rights and individual diversity.

Sachin Paradkar
President, EBARA Technologies, Inc.
July 30, 2026

And we define our internal commitment to Compliance as:

Our compliance is…….

…not only narrowly defined as compliance with Law, Regulations, Internal Rules and other rules (see below), but to incorporate the Principles of Corporate Ethics and Honesty in all that we do.

…of course we must also:

- **Comply With Laws**
  Including all Laws/Regulations/Ordinances
- **Comply With Corporate Ethics**
  EBARA Group/ETI Code of Conduct and Corporate Social Responsibility Policy
  Basic Five Principles of Taking Action
- **Comply With EC Group & ETI Internal Rules**
  Any Internal Rules, Regulations and Procedures
- **Take Action in line with all Policies/Principles**

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As you have been notified annually, EBARA Corporation (EC) notified all subsidiaries, including ETI, of the new worldwide initiative related to compliance with both fundamental ethics principles and applicable legal requirements. Under this Compliance Program, EC has encouraged us to continually improve our working environment and our position as a responsible corporate citizen and a good business partner in the communities where we work and in the markets that we serve.

In the past there have been unfortunate incidents in the business community that have caused many companies to pay more attention to compliance issues. It has been observed that, in some instances, the attention may have been more one of form over substance and of little concrete value. That is the result that we wish to avoid by incorporating this compliance initiative into ETI's daily operations and culture. We do this because it is difficult to regain confidence once it is lost.

We have adopted and will improve, if needed, a set of ethical standards to guide our conduct, reflecting such fundamental ETI core values as honesty, trust and accountability along with broad legal compliance. Further we are providing the necessary training of appropriate personnel to allow us to carry out this program with every chance to be successful.

Furthermore, ETI has policies and procedures in place regarding our Compliance Program, which the Company considers important and as governing relating to compliance with ethical and legal principles. These documents include:

1) ETI's Employee Handbook, which outlines general personnel policies, the privileges and obligations of employees and certain ethics and legal obligations of the Company.
2) ETI's Environmental, Health & Safety Policy, which deals with the Company's policies that are required to be in compliance with all applicable regulatory safety requirements as well as certain safety standards that are in place to provide a greater protection to employees beyond the legal requirements.
3) ETI's Basic Policy on Anti-Corruption, which identifies measures to prohibit bribery, prohibit antisocial forces and promote fair & free competition among Suppliers, Trade Associations and Competitors.
4) ETI's Export Management System, which provides guidance relating to the export of products and information from the U.S. to other countries as well as to citizens of other countries.
5) ETI Compliance Helpline, which provides employees with an anonymous means, to report any illegal or unethical behavior that they have reason to suspect exists at ETI.

These policies, procedures and documents are located in Finesse for review by any ETI employee at any time and/or have been circulated annually via email communication. Additionally, the ETI employees who are primarily responsible for compliance with such policies will receive appropriate training. The Company also has a system to provide regular feedback to ETI Management on any violations.

Please note, as we define our compliance above, ETI is not limited to compliance with public laws & regulations and Corporate Ethics regulations & procedures. ETI's Compliance Program is designed to

consistently bring awareness to Company Ethics and Honesty through initiative-taking actions throughout our policies, principles, and employee training courses.

To put into effect and improve our Compliance Program and provide necessary training appropriately, the Company has assigned Vanessa Cabral as Chief Compliance Officer (CCO), the responsible person for compliance and ethics in addition to his duties as ETI's Chief Financial Officer.

Additionally the company is providing several reporting routes regarding ethical and legal concerns from all ETI employees. Reporting routes you can choose are to your supervisor, manager, ETI executives, Vanessa Cabral-CCO, ETI's President and Compliance/Ethics Helpline. If it is Human Resource issue, you can also report to the HR manager.

You should never hesitate to ask a question or report a concern. If you become aware of a situation in which you believe the Company's ethical and legal conduct guidelines have been violated or if you feel you are being pressured or being asked to compromise your values, it is your responsibility to communicate this concern to the Company.

In addition, the Company places the highest priority on ensuring our employees' mental and physical health and safety. We do not engage in power harassment, sexual harassment, or any other acts that violate human rights and individual diversity. While it is preferred that you notify management directly, ETI ensures a means whereby employees can do this anonymously through an external service, ETI's Compliance Helpline, if they do not feel comfortable in reporting the violation directly to management.

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Please keep “Basic Five Principles of Taking Action” below in your mind when taking acting:

Basic Five Principles of Taking Action

-EBARA Group-

- Realize that any action, no matter how trivial, can lead to serious consequences.
- Confirm the objective and meaning of actions before carrying them out
- Follow fixed procedures and rules when carrying out actions.
- Review actions, confirm them, and take responsibility for their results.
- Adopt a wide perspective and consider areas outside one's own responsibility when carrying out actions.

If you have any questions, please do not hesitate to contact me and/or Vanessa Cabral at any time.

Sincerely,

Sachin Paradkar
President
EBARA Technologies, Inc.