## ATR Compliance Guidelines

- ATR will promote the establishment of compliance in which "Making contributions
  to the international community through pioneering and innovative research on
  information and communication-related fields, toward a future comfortable human
  life" is adopted as a basic philosophy.
- ATR is improving and reinforcing its compliance, considering recent scandals
  occurring at various companies and the Personal Information Protection Law
  enacted on April 1, 2005. In addition, ATR is extending its compliance policies to its
  Group companies such as ATR-Promotions, ATR Creative, ATR-Trek, and ATR
  Learning Technology.
- To this end, ATR implements the following "ATR Compliance Guidelines," embodying and practicing the Group philosophy and establishing basic principles for all members of the ATR Group to follow in the course of daily business:
- 1. All employees of the ATR Group will comply with laws and ordinances and behave with a sense of ethics, both in public and private life, to carry out conscientious, fair and open business activities.
- 2. All employees of the ATR Group will actively share the information necessary and useful for business activities but also handle confidential business and personal information with great care.
- 3. All employees of the ATR Group will report immediately to their superiors, and to the contact person of the Compliance Guidelines, their knowledge of any violation against the ATR compliance policy. Employees are completely protected against any disadvantage to them due to the action of reporting.
- 4. All management members of the ATR Group will strongly uphold the importance of compliance practices, extend the ATR compliance guidelines to their companies, and take the initiative to solve issues involving the guidelines.
- 5. All ATR Group companies will take prompt and appropriate action against any activity in violation of the compliance guidelines.
- 6. All ATR Group companies will actively conduct compliance training for their employees.