

TDK Group – Human Rights Statement

https://www.tdk.com/en/sustainability/social/human_rights

Introduction

The TDK Group recognizes that the foundation for our sustainable growth lies in people and believes that respect for human rights is a commitment for ensuring that the diverse people involved in the business of the TDK Group can contribute to the best of their ability. The TDK Group has stated its commitment in the TDK Group Policy on Human Rights to respect and support international norms on human rights and promote activities based on the framework of the UN Guiding Principles on Business and Human Rights (hereinafter “UNGP”).

This statement discloses the TDK Group’s initiatives with respect to human rights within the TDK Group’s businesses and throughout our supply chain, as required by the UK Modern Slavery Act and the Transparency Act in Norway. This statement reports the activities conducted in fiscal year 2025 (from April 1, 2024 to March 31, 2025) and covers all TDK Group subsidiaries.

1. About the TDK Group

The TDK Group (hereinafter “TDK”) consists of TDK Corporation, headquartered in Japan, and 147 consolidated subsidiaries around the world (as of March 31, 2025). Our focus is on information and communication technology, automotive, industrial and consumer electronics markets. TDK’s comprehensive portfolio features passive components such as capacitors, inductors, EMC components, RF components, voltage / current / temperature protection devices, ceramic switching / heating, piezo components, contactors, buzzers and microphones, transformers, ferrite and accessories, and noise suppressing / magnetic sheets. Our product spectrum also includes sensors and sensor systems, power supplies, sources and loads, lithium-ion batteries, solid-state batteries, HDD heads, magnets, software and more. The portfolio is marketed under the product brands TDK, EPCOS, InvenSense, Micronas, Tronics, TDK-Lambda and ATL. TDK has a network of design and manufacturing locations and sales offices in Asia, Europe, North and South America.

Detail of TDK Group (TDK Worldwide)

<https://www.tdk.com/en/worldwide/index.html>

2. Our Approach

2.1 Understanding of global trends on human rights issues

Since the UN Human Rights Council adopted the “protect, respect, and remedy” framework, also known as the Ruggie Framework, related to business and human rights in 2008, a series of international Corporate Social Responsibility (“CSR”) guidelines and UN and EU policies have been introduced in accordance with the framework, and several jurisdictions around the world have enacted laws addressing human rights in the context of international business. This trend represents a strong appeal to companies to specifically identify human rights issues in their business activities and take appropriate action.

2.2 Our policies for respecting human rights

The TDK Code of Conduct states that “The TDK Group will continue to respect human rights, comply with relevant laws and regulations and international rules, and discharge its social responsibility with a strong sense of ethical values for the purpose of creating a sustainable society.” To this end, for example, we specifically prohibit any form of child labor, forced labor including human trafficking and unreasonable restrictions on movement leading to bonded labor in our supply chains. We respect such internationally recognized human rights, as respect for freedom of association and right to collective bargaining. The TDK Code of Conduct also requires compliance with all applicable human rights laws and regulations including those prohibiting child and forced labor in the supply chain, such as Section 307 of the US Tariff Act of 1930, as amended.

The TDK Group Policy on Human Rights was formulated in 2016. We respect and support international norms on human rights including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the Children’s Rights and Business Principles. Based on the framework of the UN Guiding Principles on Business and Human Rights, TDK promotes the correct understanding of potential human rights issues and takes steps to address them, not only within the business operations of TDK itself but also throughout the value chain. The TDK Group Policy on Human Rights is published on our website and disseminated to internal and external stakeholders. We expect our business partners and suppliers to understand and support the TDK Group Policy on Human Rights, and we also include the prohibition of child labor, forced labor, and unreasonable restrictions on movement leading to bonded labor, as well as respect for freedom of association and right to collective bargaining, in the TDK Group Business Partner Code of Conduct and require our business partners and suppliers to comply with it.

TDK Code of Conduct

https://www.tdk.com/corp/en/about_tdk/code_of_conduct/index.htm

TDK Group Policy on Human Rights

https://www.tdk.com/en/sustainability/social/human_rights/policy

TDK Group Business Partner Code of Conduct

https://www.tdk.com/corp/en/about_tdk/procurement/pro07.htm

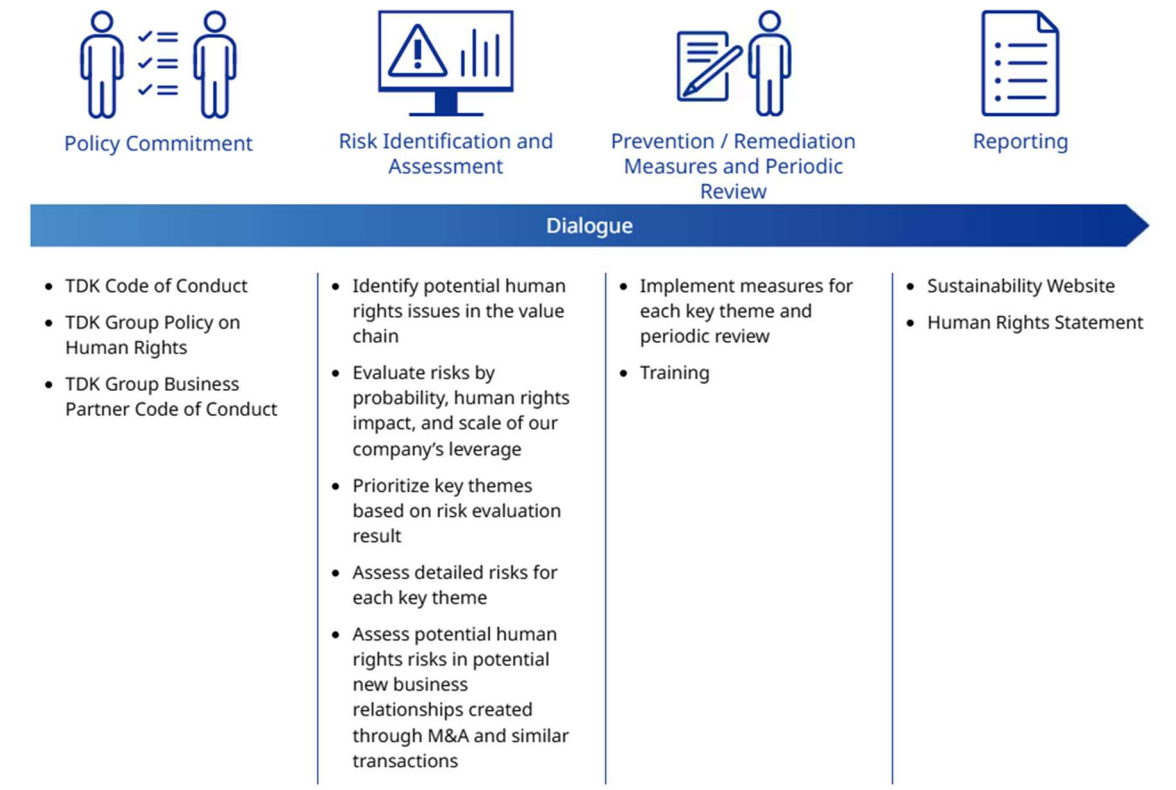
2.3 Roles and Responsibilities

TDK has established a Sustainability Promotion Group in charge of initiatives related to the respect for human rights in cooperation with the other related functions within TDK. The Sustainability Promotion Group reports to the Board of Directors at least twice a year on the status of Group-wide sustainability initiatives, including human rights initiatives. Based on these reports, the Board of Directors deliberates and makes resolutions as necessary. Effective April 1, 2025, the Sustainability Committee, which is chaired by an executive officer appointed by the President & CEO, has been newly established as a committee under the direct control of the Executive Committee. The purpose of the Sustainability Committee is to steer the promotion of sustainability at TDK as an important issue for the entire company.

3. Due Diligence Process

TDK undertakes human rights due diligence processes and promotes its due diligence activities in line with the procedures set out in the UN Guiding Principles on Business and Human Rights, as reflected inter alia in the OECD Due Diligence Guidance for Responsible Business Conduct. We also continue to dialogue with internal/external parties and stakeholders including independent external human rights experts to make our activities more effective.

Human Rights Due Diligence Process of TDK Group



4. Identification and Evaluation of Human Rights Risks

4.1 Human rights key themes of TDK Group

TDK periodically assesses the issues which may present potential human rights risks and the groups of people who might be vulnerable to such risks, through dialogue with external parties, reports from international human rights organizations and the conduct of risk assessments and CSR self-checks.

In fiscal year 2024, we reevaluated the prior years' determination of "potential human rights risks that may be addressed by the TDK Group" and "human rights key themes" as part of the review of materiality in the formulation of the new medium-term management plan starting from fiscal year 2025.

As a result, we recognize the following as three priority issues: "responsible sourcing of minerals," "respecting human rights of employees at our manufacturing sites," and "respecting human rights of employees at suppliers (including manufacturing sub-contractors and labor agencies)." We then identified specific human rights key elements that should be addressed regarding these three priority issues.

TDK has identified the below mentioned themes as key elements for its strategy on the

protection of human rights. TDK is working to implement prevention and mitigation measures and monitor progress on these key elements and will continue to reevaluate these key elements on a regular basis.

Human rights key themes

Human rights key themes	Specific human rights key elements	Measures taken by TDK
Responsible sourcing of minerals	<ul style="list-style-type: none"> • Child labor, forced labor, human trafficking 	See below URL (Responsible sourcing of minerals) https://www.tdk.com/en/sustainability/governance/responsible-minerals
Respecting human rights of employees at our manufacturing sites	<ul style="list-style-type: none"> • Working hours • Occupational safety and health • Discrimination (employment condition including compensation, education and promotion, etc.) • Harassment 	See below URL (Social and Environmental Consideration at Manufacturing Sites) https://www.tdk.com/en/sustainability/governance/environmental-issues-manufacturing
Respecting human rights of employees at suppliers (including manufacturing sub-contractors and labor agencies)	<ul style="list-style-type: none"> • Working hours • Occupational safety and health • Discrimination (employment condition including compensation, education and promotion, etc.) • Harassment • Unfair treatment of foreign workers • Child labor, forced labor, human trafficking 	See below URL (Sustainable Procurement) https://www.tdk.com/en/sustainability/governance/sustainable-procurement

For more information, please see the link below.

(Respect for Human Rights: Human rights key themes of TDK Group)

https://www.tdk.com/en/sustainability/social/human_rights

4.2 Our Approach for Identified Human Rights Key Elements

We take various approaches for key elements identified in the above table.

For more information on each approach, please see the link below.

(Respect for Human Rights: Our Approach for Identified Human Rights Key Elements)

https://www.tdk.com/en/sustainability/social/human_rights

5. Initiatives for Prevention and Reduction of Human Rights Risks

To prioritize the human rights key themes described above, we conduct activities to prevent and reduce risks referring to UNGP, RBA Code of Conduct, assessment items and audit frameworks.

In 2020, TDK joined the Responsible Business Alliance (RBA), an organization which is dedicated to improving social, environmental and ethical conditions in the global supply chains. TDK utilizes the RBA Code of Conduct as the standard to promote our CSR activities and works to follow the rules outlined in the RBA Code of Conduct.

The details are as follows.

RBA Code of Conduct

<https://www.responsiblebusiness.org/code-of-conduct/>

5.1 Responsible Sourcing of Minerals

TDK started its response to the problem of conflict minerals following the enactment of the US Dodd-Frank Wall Street Reform and Consumer Protection Act in 2010. The TDK Group Policy on Conflict Minerals was formulated in April 2013, to promote full compliance with the Due Diligence Guidance of the Organization for Economic Cooperation and Development (OECD). Considering that the scope of discussions on responsible sourcing of minerals has recently expanded to conflict-affected and high-risk areas for serious human rights violations or environmental pollution, to avoid being complicit in these problematic activities we revised our policy in January 2019. Under this revised policy, entitled the “TDK Group Policy on Responsible Sourcing Minerals,” TDK continues to promote responsible sourcing of minerals throughout the supply chain, including minerals such as tantalum, tin, tungsten, gold, cobalt and mica, which pose an increased risk of being sourced from conflict areas and regions and countries with high possibility of misconduct, including human rights abuses and

environmental destruction.

For more information, please see the link below.

(Responsible Sourcing of Minerals)

<https://www.tdk.com/en/sustainability/governance/responsible-minerals>

5.2 Respecting human rights of employees at our manufacturing sites

As a supplier, TDK recognizes the importance of fulfilling our social responsibilities by striving for social and environmental considerations at the Group's manufacturing sites. We endeavor to make improvements using in a three-stage framework comprising self-assessments, audits, and training and dialogue.

TDK implements annual CSR self-checks and risk assessments for labor, human rights and business ethics based on the RBA code of conduct at all Group manufacturing sites. These are supervised by TDK's Safety & Environment Group. In addition, we established a plan to conduct an RBA-authorized audit, customer CSR audit, or brief CSR assessment based on the RBA VAP Operations Manual at each of our manufacturing sites at least once every three years. In the course of these activities, for any sites where any issues might be identified, we prepare and implement corrective action plans.

For more information, please see the link below.

(Social and Environmental Consideration at Manufacturing Sites)

<https://www.tdk.com/en/sustainability/governance/environmental-issues-manufacturing>

5.3 Respecting human rights of employees at suppliers (including manufacturing sub-contractors and labor agencies)

TDK Group not only complies with laws and respects social norms but also fulfills social responsibilities such as respecting human rights and preserving the global environment, together with our business partners.

As an enterprise with a global range of manufacturing sites, the TDK Group stipulates the TDK Purchasing Policies to realize its Purchasing Principles and conducts purchasing activities in accordance with these principles.

Further, in accordance with the RBA standards, the TDK Group will endeavor to make improvements in two stages, self-assessment and audit, depending on the nature of the business and the transaction status with material suppliers, manufacturing sub-contractors, and labor agencies.

For more information, please see the link below.

(Sustainable Procurement)

<https://www.tdk.com/en/sustainability/governance/sustainable-procurement>

6. Communication

6.1 Training

TDK raises awareness of human rights issues through e-learning or in person training that is given to all our key employees, including those in the UK. In addition, we have also been able to identify issues through training of internal auditors based on RBA requirements and by CSR training that takes regional characteristics into consideration. In the supply chain, TDK provides educational tools as necessary to promote awareness at the time of implementing CSR self-checks.

In fiscal year 2025, a total of 115 employees participated in training programs for internal CSR auditors in Japan, China and Asia region. In Japan, 23 TDK employees who are members of relevant functions attended a presentation by an outside expert on human rights issues, including information on grievance mechanisms.

6.2 Grievance mechanisms and communications on human rights issues

TDK has established a global whistle-blowing system that allows TDK employees to speak-up or report any corporate ethics issues, including potential human rights concerns. The reporting may be made directly or through internal or external help lines that are independent from employees' own reporting lines.

For outside stakeholders, we communicate and respond through the inquiry contacts on the website. In response to inquiries on human rights issues made by some external organizations in fiscal year 2025, we explained TDK's policies on human rights and activities undertaken to ensure that TDK conducts business operations are in accordance with these policies.

In response to all inquiries and reports, relevant departments of TDK Group companies, independently or together, work to investigate, take necessary remedial actions and prevent recurrence of potential human rights issues, if any.

6.3 Dialogue

TDK has engaged in dialogues with several third-party experts to better understand human rights issues that could impact our activities.

In fiscal year 2025, we engaged in the below dialogue.

- Discussing/Identifying what TDK aims for based on the latest trend of Business and Human

Rights

TDK periodically host a dialogue with TDK top managements and an expert on human rights invited an outside expert on human rights issues and held a dialogue with top management of Sustainability Promotion HQ.

For more information of past dialogue, please see the link below.

https://www.tdk.com/en/sustainability/social/human_rights

7. Collaborative Initiatives

Since February 2020, TDK has been a member of the RBA and committed to work continuously to improve our activities throughout our supply chains, including those involving human rights issues, in line with the RBA Code of Conduct.

For responsible sourcing of minerals throughout the whole supply chain, TDK has been participating in the Responsible Minerals Initiative and the Responsible Minerals Sourcing Trade Working Group of JEITA (Japan Electronics and Information Technology) since 2011.

This statement was reported to and approved by the Board of Directors of TDK Corporation on June 13, 2025 and signed on its behalf by:

Noboru Saito
President & CEO
TDK Corporation
June 18, 2025