

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 to 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 2026 (from April 1, 2025 to March 31, 2026) and covers all TDK Group subsidiaries.

1. About the TDK Group

The TDK Group (hereinafter “TDK”) consists of TDK Corporation, headquartered in Japan, and 152 consolidated subsidiaries around the world (as of March 31, 2026). TDK operates in information and communication technology, automotive, industrial and consumer electronics markets. TDK’s Comprehensive portfolio includes Passive components such as Ceramic capacitors, Inductive devices, Sensor Application Products, Magnetic Application Products, Energy Application Products and others including Software. The portfolio is marketed under the product brands TDK, InvenSense, Micronas, Tronics, TDK-Lambda and ATL. TDK maintains a global network of design and manufacturing sites, as well as sales offices across Asia, Europe, and 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 Group Code of Conduct states that “The TDK Group shall respect and uphold international norms regarding human rights. In addition, based on the recognition that it is important to understand the potential impact of all corporate activities on human rights and to conduct activities to prevent and mitigate adverse impacts, the TDK Group shall continuously administer human rights due diligence within the value chain to fulfill its responsibilities.” To that end, TDK Group Code of Conduct provides that “the TDK Group shall not tolerate any form of inhumane labor including child labor and all types of forced labor or human trafficking” and that “the TDK Group shall comply with applicable laws and regulations regarding minimum wages, working hours, and other protections for workers.” TDK respects such internationally recognized human rights, as respect for freedom of association and right to collective bargaining. The TDK Group Code of Conduct also states that “the TDK Group shall take measures to remedy, correct, improve, and prevent recurrence if the TDK Group recognizes that its corporate activities have caused or contributed to adverse human rights impacts. In addition, the TDK Group shall enhance effective mechanisms to enable quick actions concerning any comments related to human rights, and to remediate the issue if any.”

The TDK Group Policy on Human Rights was formulated in 2016. TDK respects and supports 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 UNGP, 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. The TDK Group expects our business partners and suppliers to understand and support the TDK Group Policy on Human Rights. The TDK Group Business Partner Code of Conduct requires that TDK’s business partners and suppliers comply with the Responsible Business Alliance (RBA) Code of Conduct, as amended, which includes 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, among others.

TDK Group 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

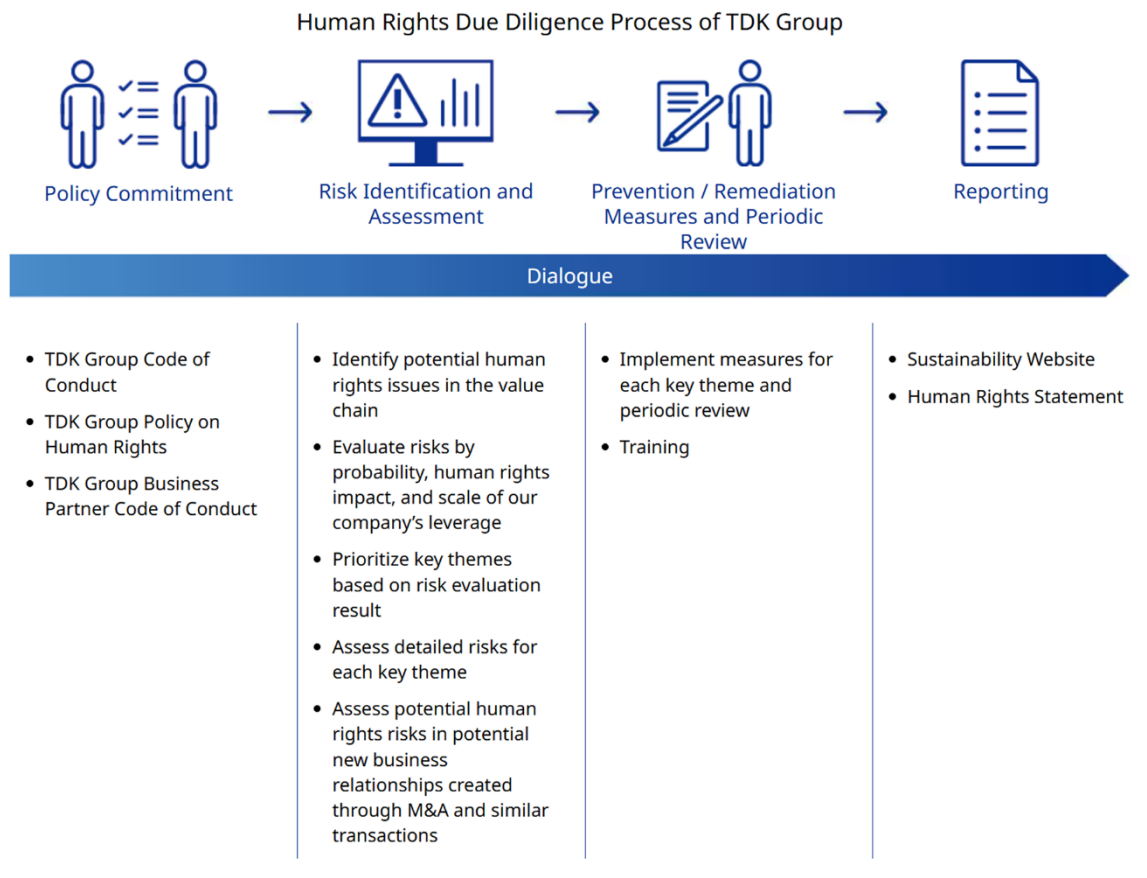
https://www.tdk.com/corp/en/about_tdk/procurement/pro07.htm

2.3 Roles and Responsibilities

TDK promotes human rights initiatives under the responsibility of the Sustainability Committee Chair (Corporate Officer). The Sustainability Promotion Group within the Corporate Strategy Headquarters works in close collaboration with relevant functions to advance these ongoing initiatives and day-to-day operations. Group-wide sustainability policies, including human rights initiatives, are discussed and deliberated by the Sustainability Committee under the direct supervision of the Executive Committee Meeting, and are subsequently submitted to both the Executive Committee Meeting and the Board of Directors Meeting on a regular basis. The Board of Directors reviews these submissions and, when necessary, undertakes further deliberations and makes resolutions.

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 UNGP, as reflected inter alia in the OECD Due Diligence Guidance for Responsible Business Conduct. TDK also continues to dialogue with internal/external parties and stakeholders including independent external human rights experts to make our activities more effective.



4. Identification and Evaluation of Human Rights Risks

4.1 Human rights key themes of TDK Group

TDK periodically assesses 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 conducting risk assessments and CSR self-checks.

In fiscal year 2024, TDK 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, TDK recognizes 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)." TDK 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

TDK takes 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, TDK conducts 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.

RBA Code of Conduct

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

5.1 Responsible Sourcing of Minerals

TDK started its response to the issue 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, and to avoid being complicit in these problematic activities TDK revised its 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, mica, copper, graphite, lithium, and nickel, 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 to improve social, ethical and environmental conditions at the Group's manufacturing sites. TDK endeavors to make improvements using 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, TDK 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, TDK prepares and implements 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 environment, together with our business partners.

As an enterprise with a global range of manufacturing sites, the TDK Group stipulates to 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, TDK has 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 2026, a total of 185 employees participated in training programs for internal CSR auditors in Japan, China, U.S. and EU region. In addition, an e-learning program about business ethics was provided to all employees of the TDK Group. Also, Sustainability Promotion Group joined programs of Business and Human Rights Academy organized by UN Development Programme (“UNDP”) and the 14th United Nations Forum on Business and Human Rights held at Geneva in November 2025.

6.2 Grievance mechanisms and communications on human rights issues

TDK has established a Group-wide 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 done directly or through internal or external help lines that are independent from employees’ own reporting lines.

For outside stakeholders, TDK communicates and responds through the inquiry contacts on the website. In fiscal year 2026, the inquiry contacts were modified so that they can send inquiries anonymously. In response to inquiries on human rights issues made by some external organizations in fiscal year 2026, TDK 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 2026, TDK engaged in the below dialogues:

- Sustainability Promotion Group held a dialogue titled “Human Rights Initiatives Expected of Global Companies and the Role of Top Management” with a human rights legal specialist and a chair of the Sustainability Committee (Corporate Officer) in March, 2026.
- Sustainability Promotion Group joined the Business and Human Rights Annual Dialogue held by UNDP in February 2026.

TDK periodically hosts 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 Group.

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 12, 2026 and signed on its behalf by:

Noboru Saito
President & CEO
TDK Corporation
June 17, 2026