

## CSR Activities

### Social Responsibility

#### Supplier Relations

### TDK Group Policy on Conflict Minerals

This policy shall apply to the worldwide organization of the TDK Group and implements the TDK Group's goal of establishing responsible supply chains for conflict minerals.

Reflecting the values embodied in the TDK Code of Conduct, the TDK group affirms the purpose of sourcing conflict-free minerals that originate in conflict-affected and high-risk areas, which is to mitigate the humanitarian crisis by cutting off sources of funding for the ongoing conflict.

The TDK Group hereby adopts this policy for responsible supply chain operation.

- The TDK Group recognizes that due diligence for responsible supply chains of minerals from conflict-affected and high risk areas is an ongoing process. Accordingly, the TDK Group will use its commercially reasonable best efforts to ensure only conflict-free minerals are used in its supply chain.
- To achieve this end, the TDK Group shall institute a due diligence conflict mineral program. The TDK Group expects that its suppliers source all inputs, including minerals, responsibly.
- The TDK group will communicate to its suppliers TDK Group's requirements to conduct reasonable due diligence of their own supply chains of minerals from conflict-affected and high-risk areas. The TDK Group will incorporate its supply chain policy and due diligence processes into commercial contracts, written agreements and supplier evaluations with its suppliers which can be applied and monitored, including, if deemed necessary, the right to conduct unannounced spot-checks on suppliers and have access to their documentation.
- The TDK Group will work in tandem with its suppliers to implement reasonable controls within the supply chain to trace the origin of minerals from conflict-affected and high risk areas in order that conflict minerals are not included within the products or materials they sell to the TDK Group. Furthermore, in the event that TDK Group discovers suppliers are not in compliance with its supply chain policy and due diligence processes, its first step is to work with them to bring them into compliance through corrective action plans. The TDK Group will not work with those who do not work to meet its standards.
- Reaching full traceability of minerals requires time and effort across industries and collaboration from all sectors in the supply chain. This is due, in a large part, to the complexity in the way that metals are produced and sold and the fact that ores from many different sources can be combined, thus multiplying the diligence necessary to trace the products. All of this is complicated by the geopolitical forces at work in the region. These factors make industry-wide cooperation of the utmost importance in achieving socially

responsible sourcing. The TDK Group strongly encourages its suppliers to comply with available international frameworks governing conflict minerals matters.

- The TDK Group is committed to the objectives of implementing responsible supply chains for minerals from conflict-affected and high-risk areas. As such, the TDK Group is working diligently to put the systems and processes into place that will enable us to ensure that the TDK Group is supporting responsible suppliers such that it will ultimately be able to declare, with a high degree of confidence, that its supply chains are conflict-free.

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