

## NDK Group - Modern Slavery Statement for FY 2022

This statement (“Statement”) is made pursuant to Section 54 of the UK’s Modern Slavery Act 2015 (“Act”). NDK Group strives to ensure that no infringement of human rights takes place in any part of business or supply chains, and that NDK does not have a hand in any other party’s infringement of human rights. The following describes the measures NDK is taking to eliminate modern slavery and human trafficking.

### **1. About NDK**

NDK started its business in April 1948 and has been consistently manufacturing and selling quartz crystal devices such as crystal units, crystal oscillators, and applied equipment, using crystal related products such as artificial quartz and crystal blanks.

NDK has many subsidiaries in the world.

NDK Europe Ltd, headquartered in London, England, is mainly engaged in sales activities throughout Europe as a subsidiary of NDK Corporation .

NDK's subsidiaries are listed in the following website:

< Domestic Sales Office >

<https://www.ndk.com/en/company/base/>

< Overseas Sales Office >

<https://www.ndk.com/en/company/base/overseas.html>

< Domestic Production / R&D Base >

<https://www.ndk.com/en/company/base/engnet.html>

< Overseas Production / R&D Base >

<https://www.ndk.com/en/company/base/engnet-overseas.html>

### **2. Policies on Modern Slavery / Human Trafficking**

#### 1) NDK’s corporate philosophy

Under NDK’s corporate philosophy of contributing to social prosperity and world peace through NDK’s services to customers based on NDK’s founding principles, it is NDK responsibility at NDK Group to pursue the contribution to best interests of NDK’s customers. At the same time, NDK must uphold high ethical standards and fulfill our social responsibility of helping to create a sustainable society.

\*Corporate philosophy

<https://www.ndk.com/en/sustainability/csr/philosophy/>

#### 2) NDK Group CSR Guideline

The NDK Group CSR Guideline has been established as a guide to proper business conduct necessary to create a sustainable society. It has been formulated on the basis of NDK's corporate philosophy and ethical standards, and applies to both management and employees of NDK Group.

The NDK Group CSR Guideline is based on the 10 principles of the Universal Declaration of Human Rights and the United Nations Global Compact, and it complies with RBA (Responsible Business Alliance) Code of Conduct. .

\* NDK Group CSR Guideline

<https://www.ndk.com/en/sustainability/csr/guideline/contents.html>

#### 3) Policies on modern slavery / human trafficking

In the NDK Group CSR Guideline, the policies on modern slavery and human trafficking are listed as follows.

●2. Respect for and Protection of Human Rights / 2-2. Prohibition of forced labor

We prohibit utilizing labor force by human trafficking, forced labor exploitation in the form of slavery and will not employ children under the age of 15.

●6. Minerals Procurement Policy

If products manufactured or sold by NDK Group contain tantalum, tin, tungsten, gold, cobalt and such. (Appendix) whose country of origin is Democratic Republic of the Congo, its adjoining countries and high-risk areas ( Appendix), the NDK Group will make efforts not to use Conflict Minerals that directly or indirectly encourage the activities of organization engaged in a risk and fraud such as 1)conflicts 2)human rights violations including child labor or 3) poor working conditions, environmental destruction or corruption. We will also request our suppliers to do likewise in the supply chain.

●9. Promotion and Dissemination of CSR Guideline / 9-2. Assessment and improvement

NDK group companies must from time to time verify and assess whether this CSR Guideline is being promoted and disseminated utilizing violations of this CSR Guideline and the whistle-blowing policy, and endeavor to make further improvements, if necessary. We also will make efforts to assess and improve, if necessary, the ethical standards of our suppliers in the supply chain.

**3. Supply Chain Human Rights Due Diligence Process**

1) Risk Management

We have used SAQ (Self-Assessment) of RBA to identify and manage risks at five of our own production plants in Japan, China and Malaysia.

Also, we have established a contact point to receive reports and consultations for all NDK group employees (including temporary staff) and business partners, in order to prevent the spread of risks and detect problems at an early stage. We have also established a contact point to receive reports and consultations regarding Human rights violations from our stakeholders, including customers, business partners, and local communities, through the "Contact Us" section of our website.

2) Training

We have distributed or made available the NDK Group CSR Guideline and the contents of Act to employees, and mandated employees to read them annually as training.

3) Efforts for Supply Chains

In our efforts for Supply Chain, on top of obtaining written consent to the NDK CSR Guideline from our suppliers, we have conducted surveys as well so as to identify and manage risks.

We also have reviewed the content of our CSR questionnaire and conducted a CSR questionnaire to our major business partners to confirm the status of their efforts on CSR which includes their response related to human rights, so that we could identify and manage risks.

For Conflict Minerals, we make a request to survey on the use of Conflict Minerals and smelters. Furthermore, we conduct an investigation likewise on cobalt and mica, which has been pointed out as a mineral of concern for human rights such as child labor.

This Statement was reviewed and approved by the NDK Corporation Board of Directors on 21<sup>st</sup> April 2023.

21<sup>st</sup> April 2023



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