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# Procurement Policy, Response to Conflict Minerals

## Procurement Policy

The TDK Electronics Procurement Policy is a general guideline for any TDK Electronics employee involved in dealing with external suppliers, service providers, partners or any other third party with the intention of purchasing Goods or Services.

Each Business Group and Subsidiary is responsible for determining its own requirements for procurement and selecting its own sources of supply. In some cases corporate agreements are made to cover the requirements of two or more Business Groups or legal entities.

Procurement policies govern the procurement of materials of the right quality, in the right quantity, at the right time, at the right price and from the right source. All procurement actions are based on conformance with all applicable laws, regulations and contractual obligations.

## Selection and Evaluation of Sources

All suppliers and their representatives are treated fairly and impartially. Ability, capacity, integrity, financial status, geographical locations, performance, reliability, quality of product, delivery and overall customer-supplier relations are factors which govern the evaluation of all sources prior to soliciting their quotation and during the tenure of the purchase contract.

We must be assured that new suppliers will be able to produce an improved product, reduce costs or offer other advantages. A new supplier's financial ability to perform is important in view of our industry's long lead times, complex engineering challenges and precise quality and inspection requirements.

In an effort to improve both quality and cost of our products, we are constantly searching for additional suppliers who offer the best value to TDK Electronics.

## Quotation Policy

The TDK Electronics procurement policy emphasizes the importance of competitive bidding. Good business practices dictate that quotation requests will be submitted to a number of qualified sources, consistent with the nature of, and the need for, the supplies or services being acquired.


Quotations are solicited via the most direct recognized sales channel of the manufacturer, making certain the obligations and responsibilities of the principal suppliers are in no way lessened or confused by transactions through a third party.

Quotations will be requested only from suppliers who are considered to be qualified and capable. A request for quotation indicates our willingness to do business with those solicited. TDK Electronics recognizes that the preparation of quotations adds expense for the supplier. It is our practice to request quotations only for firm requirements, or in the absence of firm requirements, only where circumstances dictate the need to contact suppliers.

## Response to Conflict Minerals

In recent years, armed rebels in the Democratic Republic of the Congo (DRC) or in adjoining countries have been conducting illegal mining and smuggling of minerals to fund their rebel activities. These actions not only serve to further conflict but constitute violations of human rights through forced labor and the abusive treatment of local people. In July 2010, the U.S. Congress passed financial regulatory reform legislation intended to restrict the flow of funds to these armed groups. On August 22, 2012, the U.S. Securities Exchange Commission (SEC) adopted a rule that now requires companies listed on the U.S. stock exchange to disclose their sourcing and usage of tantalum, tin, tungsten, and gold obtained from rebel-controlled mines and areas.

As a components manufacturer, TDK Electronics has no intention of supporting the above-mentioned illegal activities and violations of human rights. We place a high priority on communication in our supply chain with regard to such "conflict minerals." We ask our suppliers to disclose such information, and share that information as appropriate with our customers.

	Size	EPCOS Brand CMRT
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