

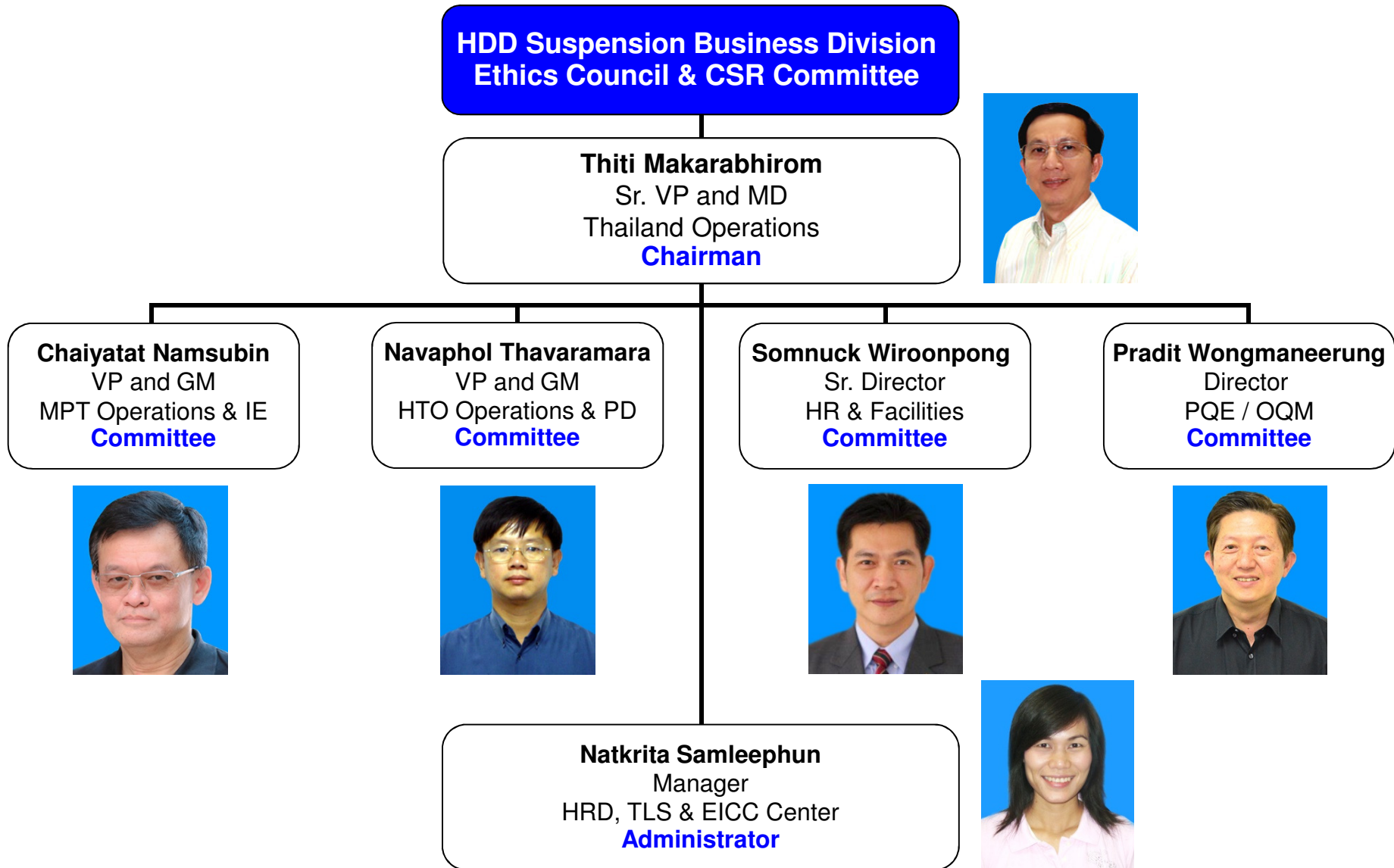


# HDD Suspension Business Division Ethics Council & CSR Committee

**HDD Suspension Business Division**

August 16<sup>th</sup>, 2017

# HDD Suspension Business Division Ethics Council & CSR Committee



## 1. Education and awareness

The TDK Business Ethics & CSR Committee and the Ethics Councils shall devote themselves to educating on and increasing awareness of TDK Members of the TDK Code of Conduct.

## 2. Problem resolutions

One of the duties of the TDK Business Ethics & CSR Committee and the Ethics Councils is to resolve problems and issues related to the TDK Code of Conduct. Depending on the nature of problem, either the TDK Business Ethics & CSR Committee or the relevant Ethics Council, or both, shall act in a cooperative manner to resolve such problems or issues.

## 3. Investigations

In order to resolve a problem relating to the TDK Code of Conduct, the TDK Business Ethics & CSR Committee and the Ethics Councils may conduct an investigation if they determine it to be necessary, or may request a relevant organization to conduct such investigation.

## 4. Duty of confidentiality and protection of an Informant

The TDK Business Ethics & CSR Committee and the Ethics Councils shall have a duty of confidentiality concerning the information that has been revealed to them through the operation of the TDK Code of Conduct Program including, to the greatest extent practicable under the circumstances, the identity of the person who requests a consultation, raises a grievance/seek an explanation, replies to questions or provides any information in relation to the TDK Code of Conduct (the "Informant"). The TDK Business Ethics & CSR Committee and the Ethics Council must protect the Informant in such a manner that he/she will not receive any unjust treatment or disadvantage due to his/her act of raising a grievance.

[Refer to Chapter 2 of TDK Code of Conduct Handbook](#)

## 5. **Proposal of corrective measures**

In the event that a material violation by a TDK Member of any law or regulation, or any provision of the TDK Code of Conduct, or other internal company rule becomes apparent, the TDK Business Ethics & CSR Committee and the relevant Ethics Council must discuss corrective measures and propose the corrective measures to the relevant member organization of the TDK Group.

## 6. **Report on the corrective measures**

The Chairperson or the branch manager shall have the right to give general managers of the relevant member organization of the TDK Group instructions that the proposed corrective measures should be taken immediately, pursuant to the decision of the TDK Business Ethics & CSR Committee. The Chairperson or the branch manager shall report to the board of directors of the relevant member organization of the TDK Group regarding the matters or issues that he or she reasonably believes are especially important. The Chairperson or the branch manager shall also instruct the general managers of the relevant member organization of TDK to submit reports on the results of the corrective measures.

## 7. **Evaluation and reporting**

The TDK Business Ethics & CSR Committee shall evaluate and review from time to time the content and operation of the TDK Code of Conduct. The TDK Business Ethics & CSR Committee shall promptly inform branch managers of any decisions that the TDK Business Ethics & CSR Committee makes.

## 8. **Meeting**

Each of the TDK Business Ethics & CSR Committee and the Ethics Councils shall hold a meeting once per quarter or more if necessary.

Keep minutes of Ethics Council meetings and records of consultations confidential.

[Refer to Chapter 2 of TDK Code of Conduct Handbook](#)

# Consultation channel for ethical issues



1. HDD Suspension Business Division Ethics Council & CSR Committee

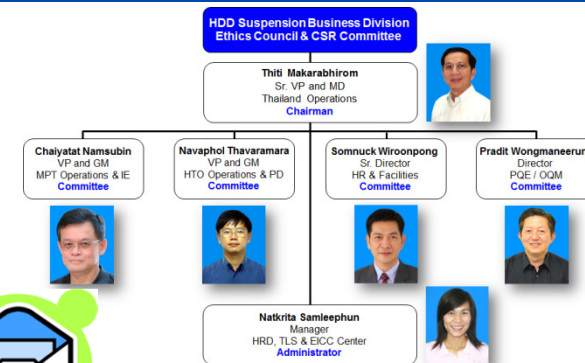
2. E-mail : CSR\_Committee@magnecomp.com



2. Suggestion box and Complaints of Ethical Business Conduct



4. TDK Group Compliance Helpline for Southeast Asia and India



#	Reporting method	Address	Language
1	E-mail	tdk_asia_helpline@amt-law.com	English, Chinese, Japanese, Malay, Thai
2	Telephone	+65-64381797	English, Chinese, Japanese
3	Postal mail or parcel delivery service	TDK Group Helpline Manager, Anderson Mori & Tomotsune (Singapore) LLP 9 Raffles Place #17-01, Republic Plaza, Singapore, 048619	English, Chinese, Japanese, Malay, Thai

