



TDK-Lambda Americas Inc.
401 Mile of Cars Way, Suite 325
National City, CA 91950 USA
Phone: +1 619-575-4400
Toll Free: +1 800-Lambda4
www.us.lambda.tdk.com

Code of conduct for TDK-Lambda Americas' Suppliers

This Code of Conduct defines the basic requirements placed on TDK-Lambda Americas' suppliers of goods and service concerning their responsibilities towards their stakeholders and the environment. TDK-Lambda Americas reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the TDK-Lambda Americas Compliance program. In such event TDK-Lambda Americas expects the supplier to accept those reasonable changes.

The supplier declares herewith:

- Legal compliance
 - To comply with the laws of the applicable legal system(s).
- Prohibition of corruption and bribery
 - To tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.
- Respect for the basic human rights of employees
 - To promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
 - To respect the personal dignity, privacy and rights of each individual;
 - To refuse to employ or make anyone work against his will;
 - To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
 - To prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
 - To provide fair remuneration and to guarantee the applicable national statutory minimum wage;
 - To comply with the maximum number of working hours laid down in the applicable laws;
 - To recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.
- Prohibition of child labor
 - To comply no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- Health and Safety of employees
 - To take responsibility for the health and safety of its employees;
 - To control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
 - To provide training and ensure that employees are education in health and safety issues;
 - To set up or use an occupational health and safety management system according to OHSAS 18001, equivalent, or appropriate to the business size and scope of product.
- Environmental protection
 - To act in accordance with the applicable statutory and international standards regarding environmental protection;
 - To minimize environmental pollution and make continuous improvements in environmental protection;
 - To set up or use an environmental management system according to ISO 14001, equivalent, or appropriate to the business size and scope of product.
- Supply Chain
 - To use best efforts to promote among its suppliers compliance with the Code of Conduct;
 - To comply with the principles of non discrimination with regard to supplier selection and treatment.



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Conflict Minerals

“Supplier will use commercially reasonable practices to ensure products or services will not be produced, manufactured or performed, in whole or in part, ... (iii) containing conflict minerals originating in the Democratic Republic of Congo or bordering countries per Section 1502 of the Dodd-Frank Act (Proof of compliance will be provided to TDK-Lambda upon request), or (iv) comprising “suspect/counterfeit parts”, defined for purposes of this section as being parts that may be of new manufacture, but are misleadingly labeled to provide the impression that they are of a different class or quality or from a different source than is actually the case.

“Suspect/counterfeit parts” also include refurbished parts, complete with false labeling, that are presented as new parts, or any parts that are designated as suspect by the U.S. Government (such as parts listed in alerts published by the Defense Contract Management Agency under the Government-Industry Data Exchange Program (GIDEP).”