

Modern Slavery and Human Trafficking Statement for the Fiscal Year 2024

1. Introduction

This statement has been published by NTN Corporation (hereinafter called “NTN”) pursuant to reporting requirements in accordance with Section 54 of the UK’s Modern Slavery Act 2015, and discloses the steps or policies taken in order to prevent modern slavery and human trafficking in the NTN Group and its supply chain.

2. About NTN Group and supply chain

NTN is a precision machinery manufacturer founded in 1918 that researches, develops, manufactures, and sells bearings and driveshafts (CVJs).

Our main products, bearings are essential and precision components that support rotation of machinery. They are used in various types of machinery including automobiles, wind turbines, rolling stocks, and others to support the lives of people around the world.

NTN aims to contribute to solving social issues around the world and realize a "NAMERAKA Society" where people can easily lead a secure and fulfilling life in harmony with nature.

The NTN Group has 208 bases in 33 countries around the world (117 sales bases, 72 manufacturing bases, 13 R&D bases, and 6 other bases as of the end of March 2025). The number of employees around the world exceeds more than 20,000 employees.

The positioning of each company within the NTN Group is generally as follows:

- Regarding domestic manufacturing, NTN primarily handles it, but some manufacturing is entrusted to domestic manufacturing affiliates, and NTN purchase from them. Additionally, part of the component processing is entrusted to domestic component processing affiliates.
- For domestic sales, NTN mainly conducts sales directly, with some through domestic sales affiliates.
- Overseas manufacturing is carried out by overseas manufacturing affiliates, which receive some semi-finished products from NTN.
- Overseas sales are conducted by NTN, overseas sales affiliates that purchase products from NTN and overseas manufacturing affiliates, as well as the overseas manufacturing affiliates themselves.

Click here for details of our business Groups and their activities:

<https://www.ntnglobal.com/en/corporate/index.html>

The NTN Group's supply chain extends globally, centered around the countries and regions where each facility is located, covering procurement of raw materials, product development, manufacturing, and logistics.

3. Our policies in relation to slavery and human trafficking

NTN has established the Sustainability Committee chaired by the Executive Officer in charge of the ESG Promotion Department (Chief Management Officer of Sustainability Activities). The Committee serves as a body that deliberates the sustainability activities required for identifying and resolving issues with a view

to realizing a “NAMERAKA Society,” including issues related modern slavery and human trafficking and it reports regularly to the Board of Directors on the details of its meetings.



We also endorsed the United Nations Global Compact (an international initiative for developing a global framework for sustainable worldwide growth) in 2015. Under the UN Global Compact, we support ten principles in the four areas of human rights, labor, environment, and anti-corruption.

Furthermore, in the following policies, etc., the NTN Group states that the NTN Group will prevent any slavery and human trafficking in any part of our own business and in any of our supply chains, and we fulfill our corporate responsibility to respect for human rights.

▪ **Corporate Philosophy**

The NTN Group’s corporate philosophy states, “We shall contribute to international society through creating new technologies and developing new products” and we aim to realize a “NAMERAKA Society” where people can easily lead a secure and fulfilling life in harmony with nature through practicing its corporate philosophy.

▪ **NTN SPIRIT**

The Founders’ Spirit that NTN has embraced since its founding in 1918 are the Frontier Spirit, which encourages us to keep challenging, and the Coexistence and Co-prosperity Spirit, which encourages us to develop together with society. The Founders’ Spirits was incorporated into the corporate philosophy as NTN’s DNA, and has been passed down to the employees for over 100 years.

In order to put the corporate philosophy into practice, the NTN Group employees use the NTN SPIRIT, the mindset and actions they are to aim for, as a cornerstone of their own work.

By putting our corporate philosophy into practice, we aim to help solve global social issues through our technical expertise and services, and achieve a sustainable “NAMERAKA Society.”

Corporate Philosophy and NTN SPIRIT:

https://www.ntnglobal.com/en/corporate/idea/corporate_philosophy.html

▪ **Management Policy**

This policy represents the NTN Group’s management philosophy and stance, and is based on the Founders’ Spirit consisting of the “Frontier Spirit” and “Coexistence and Co-prosperity Spirit” and on our corporate philosophy that incorporates these spirits. In addition, the NTN Group has clearly stated its stance towards all stakeholders involved in the NTN Group.

The NTN Group believes that in order to contribute to a sustainable society and continue to be a “company

needed by society,” it is essential to fulfill our corporate responsibilities relating to respect for human rights and to earn the trust of society. Accordingly, we have included “respect for human rights” in our Management Policy.

Management Policy:

https://www.ntnglobal.com/en/corporate/idea/management_policy.html#anchor01

▪ **Human Rights Policy**

In order to further promote human rights initiatives, we have formulated a Human Rights Policy in which all Group employees share common sense of values related to human rights and which serves as the basis for their day-to-day activities and business activities. In doing so, we are making efforts to ensure that human rights are respected. Based on the Human Rights Policy, we will address human rights issues which are gaining more and more global attention, and fulfill our corporate responsibility to respect for human rights.

Outline of the Human Rights Policy

1. NTN will respect internationally-recognized human rights.
2. NTN will not violate the human rights of others.
3. NTN will respond appropriately to any negative impacts its business activities may have on human rights.

Human Rights Policy:

https://www.ntnglobal.com/en/corporate/idea/management_policy.html#anchor04

This Human Rights Policy is based on the NTN Group’s Management Policy and clarifies responsibility to respect for human rights.

▪ **Procurement Policy**

We formulated a Procurement Policy. Based on the perspectives of “Fairness/Impartiality,” “Compliance with Laws and Regulations,” “Green Procurement,” and “Coexistence and Co-prosperity,” purchasing departments at our head office play a central role in building a relationship of trust with business partners, and promote procurement that takes into consideration the reduction of environmental impact from business partners that committed to respect for human rights, worker safety, protection of confidential information, and comply with environmental laws and regulations. Under our Procurement Policy, we have also established the “NTN Group Sustainable Procurement Guidelines” and request our business partners to actively promote sustainable activities.

Procurement Policy:

https://www.ntnglobal.com/en/corporate/idea/management_policy.html#anchor06

NTN Group Sustainable Procurement Guidelines

https://www.ntnglobal.com/en/csr/pdf/csr_guideline.pdf

4. Respond to human rights risks

- **The process of due diligence and continued initiatives**

Based on the two perspectives of “respect” and “remedy” set forth in the United Nations Guiding Principles on Business and Human Rights, The NTN Group prioritizes “responding to human rights risks in employees,” “responding to human rights risks in the supply chain,” and “building a framework that ensures access to remedies”, which is considered to have a particularly high severity among the human rights risks in the NTN Group.

In order to ascertain the actual situation about negative human rights impacts, such as forced labor, child labor and abuse of employees’ freedom and rights, in our business activities, we conducted a human rights questionnaire for our 44 overseas affiliates and received answers from all of them. As a result of the questionnaire analysis in fiscal year 2024, we conclude that the possibility of risk occurrence is low, as most of the overseas affiliates have the policy and framework for protecting human rights and non-occurrence of incidents related to human rights violation was answered. On the contrary, several companies have received complaints from employees but have already taken the appropriate and necessary actions in accordance with their internal policies. We will continue to engage in human rights due diligence by conducting periodic questionnaire to identify and resolve issues, while evaluating the effectiveness of our initiatives.

- **Respond to human rights risks in employees**

<Dialogues with labor unions and employees>

In accordance with applicable laws and regulations and labor agreements in Japan, we hold labor-management consultations with labor unions on a case-by-case basis, respecting each other's position, and listen to the opinions of our employees. In addition, we conduct human rights due diligence globally by holding dialogues with labor unions and employees in accordance with the labor situation in each country.

<Foreign workers’ human rights>

Given the vulnerable position of foreign workers in Japan, we proactively address the foreign workers’ human rights. Specifically, we investigate the working condition of foreign workers in our Group and have a system in place to enable quick response as necessary.

- **Respond to human rights risks in supply chain**

<Correspond to forced labor and child labor>

In March 2025, we revised our CSR Procurement Guidelines into the “NTN Group Sustainable Procurement Guidelines”. In line with the revision of the guidelines, we have also updated our supplier CSR questionnaire, which has been conducted once a year among suppliers, into a “Sustainable Procurement Questionnaire” with more questions on forced labor and child labor. We will conduct the annual Sustainable Procurement Questionnaire with business partners, and if the results indicate a potential risk, we will conduct a detailed interview and provide support for improvement.

<Conflict mineral surveys>

Incomes from the mining of tin, tantalum, tungsten and gold (3TG) in the conflict areas of the Democratic Republic of the Congo (DRC) and neighboring countries could be a source of capital for armed forces, which could lead to human rights infringement, illicit mining and smuggling. We continuously monitor

whether the mineral resources contained in materials and components used in our products are mined from conflict and high-risk areas. In the fiscal year 2024, we traced back through our supply chain of 244 business partners to identify the material smelters, and about 96% of such partners reported that they do not use any conflict minerals. We will continue to conduct this survey periodically.

Companies listed on U.S. Stock Exchanges are required to disclose any use of conflict minerals under the U.S. Dodd-Frank Act. Based on the results of the above survey, we respond to inquiries from our customers regarding conflict minerals, even though we are not subject to this Act.

- **Build a framework that ensures access to remedies**

<Helpline (whistle-blower system) and educational activities>

In NTN, the whistle-blower system called Helpline has been established within and outside the Company and has been operated as a contact point for providing consultation regarding violations of laws, Business Code of Conduct, and in-house regulations. Helpline provides consultation for cases such as suspected violations of labor-related laws, including harassment, as well as violations of in-house regulations, and conducts investigation in accordance with Helpline Management Rules that stipulate ensuring the confidentiality and prohibition of detrimental treatment against the whistle-blower and collaborators of the investigation. Through provision of information in various compliance training sessions and in the Code of Conduct Guidebook, we have established a structure where all employees can utilize Helpline, not only as a tool to report misconduct, but also as a means of raising questions and expressing opinions and complaints regarding the Business Code of Conduct, and maintaining satisfactory relationships between the company, officers, employees, and business partners. Whistle-blower systems are being progressively created and operated also in overseas regions, where they are tailored to local needs and circumstances.



<Establishment of harassment consultation desks and Awareness Activities>

Harassment in the workplace is not only a socially unacceptable act that unfairly damages the dignity of individuals, but it is also a serious issue that prevents individuals from reaching their full potential. In order to achieve a safe and comfortable workplace and appropriately respond to harassment, we have established relevant rules and regulations and set up harassment consultation desks in each workplace. Furthermore, through e-learning on the “Fundamentals of Harassment,” we made all employees aware of the impacts of harassment, as well as the company's obligation to maintain confidentiality when using the consultation desks and the prohibition of disadvantageous treatment of the person consulting with the company.

5. Training and Education

NTN continuously implements training and makes management and employees well known about human rights including harassment and diversity. In fiscal year 2024, we implemented e-learning on “Fundamentals of Harassment” for all employees of NTN. Furthermore, as part of self-directed learning, we offer e-learning on “Fundamentals of Diversity” and “Fundamentals of LGBTQ” that employees can voluntarily take throughout the year.

This statement was resolved by NTN's Board of Directors on July 29, 2025.

Signed by

A handwritten signature in black ink, appearing to read "Eiichi Ukai". The signature is fluid and cursive, with the first name "Eiichi" written in a larger, more prominent script than the last name "Ukai".

Eiichi Ukai

Director

Representative Executive Officer, President and CEO

NTN Corporation

July 29, 2025