

Modern Slavery and Human Trafficking Statement for FY2025

1. Introduction

This statement has been published by NTN Corporation (hereinafter, "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. 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 202 bases in 32 countries around the world (112 sales bases, 70 manufacturing bases, 14 R&D bases, and 6 other bases as of the end of March 2026). The number of employees around the world exceeds 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 we purchase from them. Additionally, part of the component processing is entrusted to domestic component processing affiliates.
- For domestic sales, we mainly conduct sales directly, with some through domestic sales affiliates.
- Overseas manufacturing is carried out by overseas manufacturing affiliates, which receive some semi-finished products from us.
- Overseas sales are conducted by NTN, overseas sales affiliates that purchase products from us 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.

■ Organization Structure



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 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’ Spirit 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, a Human Rights Policy was established by resolution of the Board of Directors. It is a common set of values related to human rights shared by all Group employees that serves as the touchstone for day-to-day behaviors and business activities, as we seek to ensure that human rights are respected.

Based on the Human Rights Policy, we will take action on human rights issues and fulfill our corporate responsibility for respecting 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 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 are committed to respecting for human rights, ensuring worker safety, protecting confidential information, and complying with environmental laws and regulations. Under our Procurement Policy, we have also established the “NTN Group Sustainable Procurement Guidelines” (hereinafter, “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. Response to Human Rights Risks

▪ Identifying and Responding to Human Rights Risks within the NTN Group

The NTN Group conducts assessments and evaluations of potential negative impacts on human rights arising from its business activities, including forced labor, child labor, and infringements on employees' freedoms and rights, in accordance with the United Nations Guiding Principles on Business and Human Rights.

Harassment was identified as one of the anticipated risks through a human rights risk questionnaire conducted for 19 domestic affiliates. Based on these findings, we are promoting the implementation of harassment prevention training and the establishment of consultation channels at our affiliates.

In addition, we conducted a human rights survey covering 44 of our overseas affiliates and received responses from all of them. Based on the results of the FY2025 survey, we assessed the risk level to be low, as most affiliates have established policies and frameworks for protecting human rights and reported that no serious incidents of human rights violations had occurred. Nevertheless, in order to gain a better understanding of the implications of the survey results and the presence of potential risks, we will follow up more thoroughly on the responses (through interviews and other means). We will also progressively implement necessary corrective and improvement measures based on the findings, thereby enhancing the effectiveness of human rights due diligence.

▪ Response to Human Rights Risks in Employees

<Sound Workplace Relations built on Constructive Labor-management Dialogues>

The NTN Group complies with labor laws and regulations in each country, establishes opportunities for labor and management to exchange information, and strives to promote mutual understanding of various initiatives.

Quarterly "Labor-Management Roundtable Meetings" are held as a forum for executives to provide thorough explanations of business operations and strategies, the business environment, and other topics, while also listening to the labor union's views. In addition, labor-management committee meetings are held as appropriate in connection with initiatives aimed at enhancing employee motivation and workplace comfort. Through active dialogue, the committee determines measures to improve working conditions so that the NTN Group remains an attractive place to work.

<Respect for the Human Rights of Foreign Workers>

The NTN Group believes it is important to develop a working environment in which all employees, regardless of nationality or background, can work with confidence and fully demonstrate their capabilities. In particular, taking into account the fact that foreign workers employed in Japan may face challenges in accessing information and communicating due to differences in language and culture, the NTN Group is taking measures to provide appropriate support. Specifically, with respect to work procedure manuals and operational guidelines, we are developing materials written in employees' native languages to ensure that work can be performed safely and smoothly. In terms of working conditions, we ensure fair and equitable treatment based on job responsibilities, role, and performance without differentiation by nationality, while also supporting long-term career development.

- **Response to Human Rights Risks in Supply Chain**

- <Sustainable Procurement Survey for Business Partners>**

The NTN Group recognizes that respecting human rights throughout its supply chain is an important responsibility, based on the Human Rights Policy and the Procurement Guidelines. To promote respect for human rights across the entire supply chain, the understanding and cooperation of not only the NTN Group but also our business partners are indispensable. Through the NTN Policy Briefing Sessions, NTN ask our principal business partners to comply with the Procurement Guidelines, including respect for human rights.

In Japan, we regularly conduct the NTN Group Sustainable Procurement Survey (hereinafter, "Procurement Survey") to identify and mitigate various potential risks within the supply chain, including human rights risks. Through the Procurement Survey, we review the status of our business partners with respect to human rights-related issues based on the Procurement Guidelines, such as forced labor, child labor, and occupational health and safety issues, and promote improvements.

In FY2025, we conducted the Procurement Survey targeting 465 business partners and received responses from 79% of them. Based on analysis of the responses and detailed follow-up interviews with certain business partners, no significant human rights risks have been identified at this time.

Based on the results of the Procurement Survey, for issues identified as requiring priority improvement, we share an improvement guide prepared by NTN with business partners, promote a deeper understanding of human rights, and support their efforts. In addition, through the continuous implementation of the Procurement Survey, we monitor changes in business partners' responses and assess whether their initiatives have improved. We will continue to conduct the Procurement Survey and strive to mitigate human rights risks in the supply chain.

- <Conflict Mineral Survey>**

Proceeds 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 groups, which could lead to human rights violations, illicit mining, and smuggling.

NTN continuously monitors whether the mineral resources contained in materials and components used in our products are mined from conflict-affected and high-risk areas.

In FY2025, we traced back through our supply chain of 122 business partners to identify the smelters, and received responses from 93% of them. No use of conflict minerals was identified through this survey; however, we will continue to conduct this survey on a regular basis.

Companies listed on U.S. Stock Exchanges are required to disclose any use of conflict minerals under the U.S. Dodd-Frank Act. Although we are not subject to this Act, we conduct surveys in line with its intent and respond to inquiries from our customers regarding conflict minerals.

- **Building Access to Remedies**

- <Establishment of Harassment Consultation Desks and Awareness-Raising 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, NTN has established relevant rules and regulations and set up harassment consultation desks in each workplace.

Furthermore, through e-learning on the “Fundamentals of Harassment,” we raise awareness among all employees 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.

<Helpline (Whistle-blower System) and Educational Activities>

At 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, the Business Code of Conduct, and in-house regulations. We conduct investigations in accordance with the “Helpline Management Rules,” which stipulate strict compliance with confidentiality obligations and prohibit any disadvantageous treatment of whistleblowers or individuals who cooperate with investigations. Through this framework, we address various types of concerns, including harassment. In addition to serving as a reporting mechanism for misconduct, the helpline also functions as a channel for raising questions and providing feedback regarding compliance with the Business Code of Conduct, and maintaining satisfactory relationships between the company, officers, employees, and business partners. Overseas, responses are also handled through internal reporting channels that have been established and operated in accordance with the circumstances of each region.



5. Training and Education

The NTN Group promotes human rights education for its employees based on its Human Rights Policy. NTN continuously provides training programs on human rights issues, including harassment prevention and diversity, for both management and employees. For instance, NTN offers year-round e-learning programs covering “Introduction to Diversity” and “Introduction to LGBTQ.”

In FY2024, NTN implemented an e-learning program focused on “harassment,” a human rights issue that is particularly familiar to employees and closely related to their daily work. This initiative aims to help employees recognize human rights challenges as relevant to themselves and to build a foundation for such awareness.

In response to international requirements such as the UK Modern Slavery Act, companies are expected to go beyond individual topics and adopt a broader perspective that considers the overall impact of business activities on human rights.

Based on this recognition, NTN implemented an e-learning program on “Business and Human Rights” in FY2025 to promote a systematic understanding of a wide range of human rights issues.

Approximately 70% of our domestic and overseas affiliated companies have implemented human rights

education initiatives for their employees. The NTN Group will continue to expand these efforts across the remaining companies.

This statement was approved by NTN's Board of Directors on July 30, 2026.

Signed by

A handwritten signature in black ink, appearing to read 'Eiichi Ukai', written in a cursive style.

Eiichi Ukai

Director

Representative Executive Officer

CEO (Chief Executive Officer)

NTN Corporation

July 30, 2026