TDK

CORPORATE POLICY STATEMENT ON GLOBAL TRADE COMPLIANCE

It is InvenSense, Inc.'s ("InvenSense") policy to require strict compliance with all laws and regulations concerning the import, export, re-export, and transfer of our products, services, software, and technical information. We take pride in knowing and following both the letter and spirit of global trade compliance laws in the countries where we operate. Our policy is to first comply with these rules, and then to actively pursue lawful business opportunities under these rules.

Failure to comply with applicable trade laws and regulations may result in severe consequences for InvenSense, including substantial monetary penalties, loss or restriction of import/export privileges, and reputational damage. For individuals, violations can lead to disciplinary action up to termination of employment. Intentional violations may also constitute criminal offenses punishable by fines or imprisonment.

Ensuring rigorous compliance with global trade laws and regulations is essential to our continued success and reputation as a responsible global company. Therefore, InvenSense makes the following commitments:

Governance and Oversight: Under the guidance of the General Counsel, the Compliance Director, oversees and manages trade compliance matters within the organization.

Risk Management: To identify, assess, and mitigate trade compliance risks related to business transactions and partners. To conduct due diligence on third parties to mitigate the risk of diversion to prohibited end uses and end users.

Compliance Requirements: To comply with all applicable laws and regulations governing imports, exports, economic sanctions, and customs. Employees must maintain awareness of the relevant requirements and seek guidance from the Legal Department when needed.

Internal Controls: To maintain a comprehensive system of internal controls, auditing, and recordkeeping that ensure an ongoing compliance with this policy and applicable regulations.

Screening and Monitoring: To screen all transactions and parties against the restricted parties lists and applicable export controls. To establish procedures that address potential compliance issues.

Training: To provide a comprehensive training on global trade compliance obligations to employees in accordance with their respective job role and responsibility.

Reporting and Response: To promptly investigate and address reported concerns or suspected violations. InvenSense has a strict zero-tolerance policy against retaliation for raising good faith compliance concerns.

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Management and supervisors are responsible for ensuring employee understanding and adherence to global trade compliance requirements relevant to their roles. Any business activities potentially conflicting with the regulations or terms of our licenses/authorizations must be promptly reported to the supervisor and the Legal Department. Employees may also escalate trade compliance concerns to higher management for review.

You may request to raise concerns anonymously; however, providing your name can facilitate a more thorough review. InvenSense prohibits retaliation against anyone for raising good faith concerns about potential violations or participating in investigations. No employee will face disciplinary action or retaliation for seeking guidance on our legal and ethical trade obligations.

If you have any questions about this policy, specific situations, or the legitimacy of a trade transaction, please contact the Compliance Director at INV.Legal@tdk.com.

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Joseph Bousaba
Chief Executive Officer and President