

TTM's California Transparency in Supply Chains Act of 2010 Disclosure Statement

The California Transparency in Supply Chains Act of 2010 requires manufacturers doing business in California to disclose efforts to eradicate slavery and human trafficking from its direct supply chain. TTM Technologies, Inc. ("TTM" or the "Company") is committed to responsible sourcing and seeking the elimination of human trafficking and slavery, if any, in our supply chain. TTM prohibits the use of child labor, and the use of forced, bonded, or indentured labor practices in its operations. Additionally, TTM forbids harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. TTM sets expectations for social responsibility in its supply chain for external vendors and suppliers and internal members of its workforce.

Verification:

TTM engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery through the following processes and methods:

- (1) TTM vendors and suppliers are expected to comply with the guidelines of the Responsible Business Alliance Code of Conduct, formerly the EICC, which covers both slavery and human trafficking, as well as TTM's values and principals outlined in its Code of Business Conduct (the "Code"), available at: http://www.ttmtech.com/about/documents/The_TTM_Code.pdf. TTM is committed to its Code and business practices that reflect our company's values, including treating people with dignity and respect.
- (2) TTM requires that its direct suppliers for tangible goods offered for sale ("Suppliers") complete a Supplier Assessment Approval Package, including a corporate Supplier Self-Assessment Survey Form, Quality Manual acknowledgement, and ISO 14001 Certification (collectively, the "SAAP") as part of the Company's initial intake process before we place any production orders. TTM's SAAP contains disclosure requirements mandating all Suppliers self-certify they have adequate corporate responsibility policies for social, health, and safety management measures in place as well as company initiatives to denounce all forms of human trafficking and slavery. TTM maintains an Ethics hotline and encourages employees and suppliers alike to report any potential violation.
- (3) TTM requires current and prospective Suppliers to certify compliance with our Company's standard Terms and Conditions of Purchase ("Terms of Purchase"), available at: <http://www.ttm.com/legal/terms-of-purchase/> as part of the Company's SAAP, whereby all Suppliers must acknowledge that "no applicable governmental laws, rules, or regulations have been violated in the manufacture or sale or shipment" of the items purchased in such purchase order. Our Terms of Purchase additionally mandate Suppliers confirm they have read and agree to act in a manner consistent with TTM's Code, which expressly requires the Company: a) not use or condone the use of forced labor or human trafficking; b) treat others with mutual respect and ensure safe working conditions; and c) support TTM's efforts to ensure all products are free of conflict minerals.

- (4) TTM's commitment to regulatory compliance is further documented in our Environmental Policy, available at https://www.ttmtech.com/support/documents/SupplierWebPageText_31Aug11.pdf, wherein TTM certifies each of its facilities meet the intent of customer and electronic industry requirements covering chemical use, air emissions, waste water discharges and waste management at all times in an effort to prevent pollution by utilizing only low toxicity raw materials and supporting recycled product markets whenever economically viable.
- (5) TTM verifies product supply chains through several other methods, including site evaluations, inspections, verification of government debarments and denied parties lists, among others. TTM requires as a condition of contract that all suppliers agree to comply with all applicable laws and regulations. Suppliers outside the United States are required to comply with their local laws, as well as applicable laws of the United States.
- (6) TTM has adopted a Conflict Minerals Policy and Statement (the "Policy") a copy of which can be found on the Company's website at http://ttmtech.com/about/documents/Conflict_Minerals_Information.pdf. In accordance with the Policy, TTM continues to review its suppliers' declarations and has sought their cooperation and assistance in ensuring that Conflict Minerals used in TTM products are sourced reliably and responsibly.

TTM is committed to providing the necessary capital, manpower, training, and management resources to evaluate and address the risks of human trafficking and slavery through the aforementioned Company procedures. TTM uses an internally developed rubric, based in part on industry standard metrics, including those of the PCB Industry Association, for internally monitoring the Company's efforts to protect both human health and the environment at every TTM facility globally. The comprehensive and well-documented internal protocols enable our own risk-management team to effectively fulfill our Company policies, and as such have not necessitated the engagement of any third-party monitor in TTM's fulfillment of both legal requirements and internal Company directives.

Audits:

TTM supports the Responsible Mineral Initiative conflict free smelter program as well as the development and implementation of due diligence practices and tools such as the conflict minerals reporting template. TTM submitted its Form SD with Exhibit 1.01 for the reporting period ended December 31, 2019 to the SEC and posted the same on the company's external website on May 29, 2020. In accordance with the requirements of the foregoing, TTM has not obtained its own independent private sector audit of refineries and smelters.

TTM conducts on-site audits of our prospective and existing Suppliers' manufacturing facilities as follows: TTM conducts global audits every four years without the assistance of any third-party service provider through self-assessment procedures. TTM further reserves and exercises the right to conduct supplemental, unannounced on-site audits as it may deem necessary from time-to-time of its Suppliers, or where required by law or mutually-agreed upon terms as well as announced audits following prior reasonable notice to said Suppliers.

Certification:

TTM requires its Suppliers undertake and agree to adhere to our Terms of Purchase, or the intent thereof, in order to “provide any information requested by [TTM] with respect to the origin of minerals used in the goods, including but not limited to information required pursuant to 12 U.S.C. § 1502 and associated United States Securities and Exchange Commission rules.” Additionally, “TTM ... requires its suppliers to identify the source of these four [conflict] metals used in making raw materials for TTM on form CE041, which is the latest revision (currently v3.02 dated November 7, 2014) of the CFSI’s “Conflict Minerals Reporting Template” (CMRT)” on its Terms and Conditions of Purchase: Conflict Minerals Statement, available at: http://www.ttmtech.com/support/documents/Conflict_Materials_Requirements_for_Suppliers_TMTCP400.pdf (“Conflict Minerals Statement”).

TTM has guidelines in place through the SAAP and the Code requiring that Suppliers certify that materials incorporated into TTM’s products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

In an effort to mitigate risk, TTM’s purchasing decisions are and will continue to be influenced by the level of cooperation it receives from suppliers in responding to the Company’s diligence inquiries and otherwise in sourcing responsibly from non-conflict areas.

Accountability Standards:

TTM’s Code currently has a written provision setting out its accountability standards with respect to Human Trafficking and Child and Forced Labor. TTM’s Code expressly states that the “Company will take appropriate action against any employee, agent, contractor, or consultant whose actions are found to violate these policies, or any other policies of the Company. Violations of this Code of Conduct or applicable laws are subject to disciplinary action which can include reprimand, probation, suspension or termination, as well as legal action if appropriate. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.

Where laws have been violated, the Company will cooperate fully with the appropriate authorities.” TTM’s Ethics hotline allows employees and suppliers to report any potential violation to ensure compliance with TTM’s standards.

Training:

TTM requires employees to annually state that they “review, understand, and abide by the Code of Business Conduct.” Moreover, management personnel are required “to affirm that they have read and understand the Code in the annual certification process.” To that end, the company policy sets forth procedures to ensure “employee training will also be conducted to address other specific issues.” Because the Company Code is designed to reflect and surpass the ethical conduct standards set forth in applicable laws and regulations, TTM further designates select Company management personnel to provide advice on compliance programs and to issue separate policies from time-to-time to deal with specific aspects and situations of the Company policies.

TTM & California Transparency in Supply Chains Act Requirements Resources:

TTM Terms of Purchase are available at: <http://www.ttm.com/legal/terms-of-purchase/>

TTM's Conflict Minerals Statements is available at:

http://www.ttmtech.com/support/documents/Conflict_Materials_Requirements_for_Suppliers_TT

MTCP400.pdf

TTM's Code is available at: http://www.ttmtech.com/about/documents/The_TTM_Code.pdf

TTM's Environmental Policy (EHS 4.2 Revision G) is available at:

https://www.ttmtech.com/support/documents/SupplierWebPageText_31Aug11.pdf