

Compliance

► Basic Approach

The Minebea Group believes that implementing compliance is an essential part of promoting CSR. Accordingly, we have established the Minebea Group Code of Conduct and Minebea Group Officer and Employee Compliance Guidelines, and on the basis of these policies, we strive to achieve fair, appropriate and highly transparent management.



Please visit the Minebea Group website for detailed information regarding the Minebea Group Code of Conduct and Minebea Group Officer and Employee Compliance Guidelines.

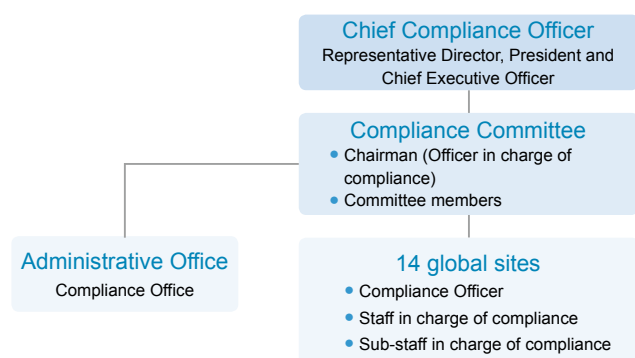
<http://www.minebea.co.jp/english/corp/company/aboutus/conduct/declaration/index.html>

► Compliance Promotion Structure

The President and Chief Executive Officer of the Minebea Group has ultimate responsibility for compliance. He is supported directly by the Compliance Committee. Meeting twice a year, the committee ensures implementation of the Code of Conduct and makes decisions on emergency response measures in the event of significant violations of the code. The Compliance Office acts as the administrative body for the Compliance Committee, creating various policies for the promotion of compliance.

In addition, we have appointed compliance officers for each site in order to bolster the Group's compliance management. In FY2015, we confirmed the compliance status in China and Thailand, while taking measures to strengthen coordination in these countries.

► Compliance Framework



► Compliance Awareness Survey

Minebea conducts compliance awareness surveys biennially to gauge employees' understanding of compliance. The survey in FY2015 was the second following the first one in FY2013. Responses were received from 3,839 Japanese employees working in and outside Japan. The survey found that employees are developing a more positive interest in compliance. Moving forward, we will use the survey results to develop future training programs.

► Compliance Education

The Minebea Group also provides training to deepen employees' understanding of compliance. Compliance training is provided along with rank-based training programs. In FY2015, 150 employees received training. We also provide lectures to 750 employees in and outside Japan as part of regular training on compliance with Japan's Antimonopoly Act (competition law). Furthermore, we invited outside attorneys to give lectures on bribery prevention to 42 executive officers including the President and Chief Executive Officer.

Outside Japan, we provided compliance training to local employees in South Korea, attended by a total of 39 employees.

► Internal Reporting System

The Minebea Group provides internal and external consultation services for employees to contact when they have questions about whether their own conduct violates the Minebea Group Code of Conduct, or in cases where employees believe others may be in violation of the code. We respond appropriately to all reports received by these services.

► Future Compliance Promotion

The Minebea Group believes that employee awareness and knowledge of compliance should be deepened to establish a corporate culture in which each employee maintains an awareness of compliance in conducting business activities. Moving forward, we will enhance our training programs and thoroughly raise awareness of consultation centers, while strengthening collaboration among countries to improve our compliance promotion structure covering the entire Minebea Group.