

# Compliance

## Basic Approach

The MinebeaMitsumi Group believes that implementing compliance is an essential part of promoting CSR. Accordingly, we have established the MinebeaMitsumi Group Code of Conduct and MinebeaMitsumi 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 website below for detailed information regarding the MinebeaMitsumi Group Code of Conduct and MinebeaMitsumi Group Officer and Employee Compliance Guidelines.  
<http://www.minebeamitsumi.com/english/corp/company/aboutus/conduct/declaration/index.html>

## Compliance Promotion Structure

The CEO and COO of the MinebeaMitsumi 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 Promotion 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 FY2016, we established a new compliance committee in Thailand which is working to strengthen their systems.

### ● Compliance Framework



## Compliance Awareness Survey

MinebeaMitsumi conducts two compliance awareness surveys each year to gauge employees' understanding of compliance. The survey found that employees are developing a more positive interest in compliance. Furthermore, based on the results of the survey, we are working to raise awareness about how to use the compliance consultation service. The next survey is scheduled for implementation in FY2017.

## Compliance Education

The MinebeaMitsumi Group also provides training to deepen employees' understanding of compliance. Compliance training is provided along with rank-based training programs. In FY2016, 202 employees received training. We also provide lectures in and outside Japan as part of regular training on compliance with Japan's Antimonopoly Act (competition law). Lectures were given to 74 employees in Japan and overseas, and 4,050 employees took part in e-learning on the topic.

During FY2016, we provided compliance training to employees in China and Thailand. The lectures were attended by 90 staff in Thailand and 20 staff in China.

## Internal Reporting System

The MinebeaMitsumi Group provides internal and external consultation services for employees to contact when they have questions about whether their own conduct violates the MinebeaMitsumi 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 MinebeaMitsumi 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 MinebeaMitsumi Group.