

December 1, 2017

MinebeaMitsumi Inc.
Personnel Department

Clawback policy at MinebeaMitsumi Inc.

All Inside Directors of our company other than the Vice Chairman hold the position of Executive Officer. Also, we have the rule "Regulation Concerning of Executive Officer" and in Article 15 of this regulation mentions "Prohibition of Compensation and Conflict-of-Interest Transactions" which prescribes "If an Executive Officer has factually violated the preceding paragraph, he/she shall return the entire amount of the retirement benefit received at the time of his/her retirement" in this article. "

/e