

# Compliance

## Basic Approach and System for Promoting Compliance

The Minebea Group regards compliance as an indispensable factor in our business activities, and we believe compliance not only involves adherence to laws and regulations but also involves activities in accordance with corporate ethics as a good corporate citizen, based on an awareness that putting compliance into practice is one element of CSR implementation. To this end, we have formulated the Minebea Group Code of Conduct as a set of standards for group executives and employees in selecting appropriate actions and striving to conduct our business in a fair, proper, and transparent manner. In FY2010, a more specific version of the Minebea Group Officer and Employee Compliance Guidelines was established so that every employee can conduct business with high ethical standards.

To ensure company-wide compliance, the President and Chief Executive Officer of the Minebea Group has overall compliance responsibility, supported directly by the Compliance Committee. The Compliance Committee is responsible for applying the Code of Conduct, and for decision-making regarding emergency measures in the event of significant violations of the code. The Compliance Office of the CSR Promotion Division acts as the secretariat for the Compliance Committee, carrying out education, training, and other measures to promote compliance throughout the company.

## Compliance Education

To help employees understand compliance, the Minebea Group conducts compliance education as part of its training programs for employees at each rank. In FY2010, a total of 368 employees ranging from new employees to newly appointed managers underwent compliance training. We provide easily understood training for new employees using case studies to help employees understand what kinds of action can be problematic in compliance terms.



New employee training

In addition, 151 employees acting as sales representatives attended training programs focusing on Japan's Antimonopoly Law.

## Internal Reporting System

To prevent actions in violation of the Minebea Group Code of Conduct or legal infractions, we have established internal as well as external consultation centers that employees can access when they are unsure as to whether or not an action or decision on their part may be in violation of the Code of Conduct, or if they encounter actions on the part of others that may be in violation of the Code. The privacy of individuals reporting information is protected, and appropriate measures are taken to ensure that they do not experience unfair treatment.

## Import/Export Control Initiatives

To maintain international peace and safety, the Minebea Group has established a management system and created procedural forms and manuals to ensure that our Logistics Division adheres to customs laws and other laws and regulations. In FY2007, we received Authorized Importer and Authorized Exporter certification from Tokyo Customs in recognition of our outstanding freight and compliance management.

## 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. Going forward, we will strengthen the Minebea Group's overall structure for compliance promotion, and will continue working to implement such measures as training utilizing e-learning and enhancement of our intranet-based compliance database, to achieve more efficient and effective compliance-related educational activities.

For details on the Minebea Group Code of Conduct and the Minebea Group Officer and Employee Compliance Guidelines, please see the Minebea Group website. (<http://www.minebea.co.jp/english/company/aboutus/conduct/declaration/index.html>)