

Compliance



Website listed
information:

• Initiatives in import and
export management

Basic Approach

The Minebea Group believes that 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 guidelines, we strive to achieve fair, appropriate and highly transparent management.

In August 2012, the U.S. Securities and Exchange Commission adopted a disclosure rule mandated by U.S. financial reform legislation requiring companies to disclose the use of conflict minerals. In response, we added a Minebea Group policy on conflict minerals to our Minebea Group Code of Conduct in FY2012.

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

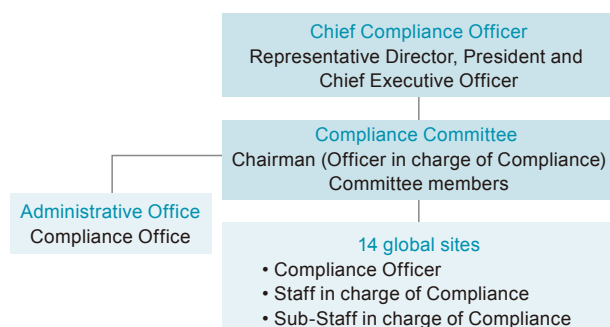


<http://www.minebea.co.jp/english/company/aboutus/conduct/declaration/index.html>

Compliance Promotion Structure

The President and Chief Executive Officer of the Minebea Group has overall compliance responsibility, supported directly by the Compliance Committee. This 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 acts as the administrative body for the Compliance Committee, creating various policies for the promotion of compliance. In FY2012, we revised the committee structure to facilitate faster decision-making. Compliance Committee meetings are now held twice annually instead of once, and compliance officers have been appointed at each site to bolster management.

► Compliance Framework



Compliance Education

To help employees understand compliance, the Minebea Group conducts compliance education as part of its training programs for employees at each level. In FY2012, 180 employees received training, comprised of new employee training and training for new managers and assistant managers. In FY2012, as part of efforts to enhance overseas training programs, we conducted rank-based compliance training in Thailand which was attended by 40 expatriate managers and other mid-level employees. The training covered local laws, culture, and business customs differing from those in Japan, emphasizing the key points employees should keep in mind.

Additionally, external instructors provided compliance training for 30 executive officers, including the president, in response to the growing calls for improved compliance management amid a recent spate of corporate scandals.

Internal Reporting System

The Minebea Group has established both internal and external consultation centers in order to prevent violations of the Minebea Group Code of Conduct or laws. Employees can contact the centers in the event they are unsure about whether their own conduct or decision violates the code, or when an employee discovers conduct that might be in violation of the code. We investigate the accuracy of all reports to the centers and take appropriate action in response.

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. In the future, the compliance officers will spearhead our efforts to strengthen the compliance promotion structure of the entire Group, including overseas sites, by enhancing collaborative programs between countries.

In addition, we will continue striving to prevent violations of the law by thoroughly implementing antitrust training programs as well as awareness programs on insider trading regulations.