

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.



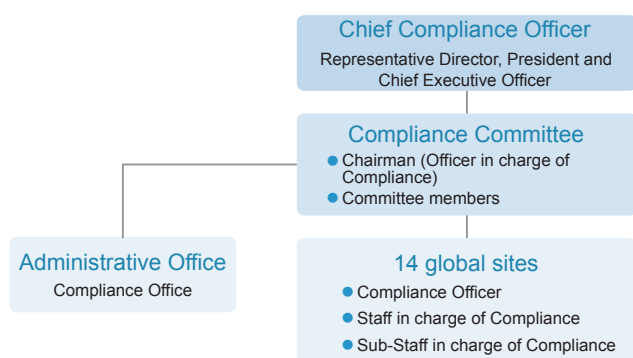
Please visit the Minebea Group website for detailed information regarding the Minebea Group Code of Conduct and Minebea Group Officer and Employee Compliance Guidelines.

<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. From FY2012, we appointed compliance officers for each site in order to bolster the Group's compliance management.

● Compliance Framework



● 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 FY2014, 131 employees received training. We also provide regular training on compliance with Japan's Antimonopoly Act (competition law), inviting outside attorneys to give lectures to 50 executive officers including the President & CEO. Compliance training was also provided to domestic sales divisions and attended by 279 employees.

Outside Japan, we provided compliance training to local managers in Thailand, Cambodia, and South Korea, attended by a total of 218 employees.

● 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.

Regarding Violations of Competition Laws

In November 2014, the Korea Fair Trade Commission announced that Minebea Co., Ltd. and NMB Korea Co., Ltd., Minebea's Korean sales subsidiary, had committed a violation of the Korea Fair Trade Law (competition law) in relation to the past trading of small-sized ball bearings in Korea. Minebea agreed to the commission's order for corrective action by both companies and payment of a surcharge of 4.912 billion Korean won (approximately 500 million yen) by Minebea. Additionally, in February 2015, Minebea entered into a plea agreement with the U.S. Department of Justice, agreeing to pay a fine of 13.5 million USD (approximately 1.6 billion yen) based on the violation of U.S. antitrust law in connection with past sales of certain small-sized ball bearings.

With regard to these issues, we deeply apologize to all the parties concerned, including our shareholders and customers, for causing significant worry. Minebea takes the matters very seriously and will ensure thorough compliance systems while making all-efforts to regain trust and credibility.

Minebea has issued a declaration pledging that it will not commit violations of antimonopoly laws, including cartel activities, or take any inappropriate action that might raise suspicion of a violation. We are taking company-wide efforts to prevent reoccurrence of violations. Specifically, from April 2013 we began operating an internal rule by which, in principle, we prohibit contact with competitors. Additionally, we issued a revised antimonopoly act compliance manual in April 2014 and have been striving to raise awareness.

Furthermore, in addition to regular antimonopoly law (competition law) training, we instituted antimonopoly law training through an e-learning system and provided the training to 3,651 Japanese employees and other employees capable of receiving Japanese-language training.