

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.

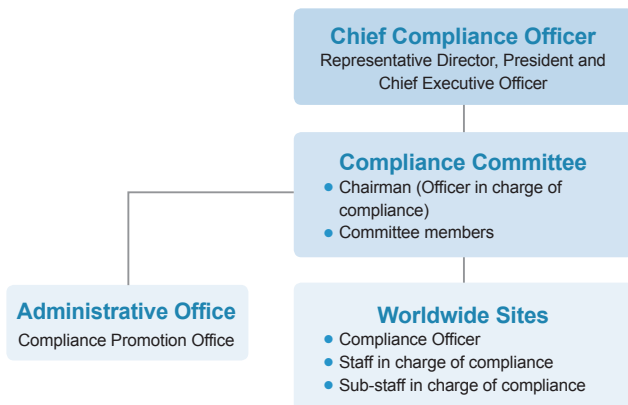
<http://www.minebeamitsumi.com/english/corp/company/aboutus/conduct/declaration/index.html>

Compliance Promotion Structure

The President and Chief Executive Officer 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. In FY2017, we investigated responses taking into consideration the most recent versions of laws and regulations and other factors as well as reinforcement of Group structures.

The Compliance Promotion Office acts as the administrative body for the Compliance Committee, creating various policies for the promotion of compliance. In Thailand, a Compliance Committee was established in FY2016, and efforts are being made to gather information on issues and respond to them.

► Compliance Framework



Compliance Awareness Survey

MinebeaMitsumi conducts compliance awareness surveys biennially to gauge Group employees' understanding of compliance.

Based on the results of the survey, which was conducted in October and November 2017, we confirmed that there are no problems regarding awareness and interest regarding compliance. Feedback on the survey results was provided to individual divisions, and we continue to broadly disseminate information on how to use consultations services, which was identified as an issue.

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 FY2017, 159 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 541 employees in Japan and overseas.

Overseas, we conducted compliance training for Japanese employees in Thailand, our largest production site. The training was attended by 178 employees.

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, to strengthen collaboration among countries to improve our compliance structure covering the entire MinebeaMitsumi Group.