

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.

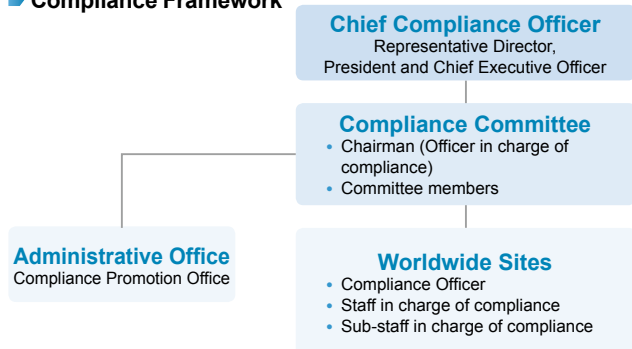
<https://www.minebeamitsumi.com/english/corp/company/aboutus/conduct/declaration/index.html>

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.

The Compliance Promotion Office acts as the administrative body for the Compliance Committee, creating various policies for the promotion of compliance. In FY2018, we appointed compliance officers as well as staff and sub-staff in charge of compliance at the Cebu Plant that was added to the Group as a result of business integration and reinforced structures throughout the Group.

Compliance Framework



Compliance Awareness Survey

The MinebeaMitsumi Group conducts compliance awareness surveys biennially to gauge 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 are reinforcing training based on the results. We are also broadly disseminating information on how to use consultations services, which was identified as an issue.

We plan to conduct the next survey in FY2019.

Compliance Education

The MinebeaMitsumi Group also provides rank-based training and training at the time of mid-career hiring to deepen employees' understanding of compliance. In FY2018, a total of 364 employees underwent training. We also conduct training taught by outside instructors for directors, executive officers, and business unit heads on compliance with Japan's Antimonopoly Act (competition law). This training was attended by 69 employees.

In addition, we conducted e-learning-based training that included explanations concerning compliance and tests to check understanding levels for all 2,808 employees who previously worked for Mitsumi Electric.

Internal Reporting System

The MinebeaMitsumi Group has established internal and external consultation services for employees to contact when they have questions about whether their own conduct or decision making violates the MinebeaMitsumi Group Code of Conduct or in cases where employees believe others may be in violation of the code. Anonymous reports may also be made. Reports can also be made internally to corporate auditors.

The MinebeaMitsumi Group Code of Conduct expressly prohibits disadvantageous treatment of an inquiring employee on the grounds that such an inquiry was made, and mechanisms have been put in place to protect personal information and comply with the duty of confidentiality.

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 with countries in order to improve our compliance structure covering the entire MinebeaMitsumi Group.