



Compliance

Basic Approach and System for Promoting Compliance

The Minebea Group regards compliance as an indispensable factor in our business activities. 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 prescribed the Minebea Group Code of Conduct and Minebea Group Officer and Employee Compliance Guidelines 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.

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 Corporate Finance & Compliance 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 FY2011, 224 employees received training, comprised of new employee training and training for new managers and assistant managers. During the year the Group also strengthened compliance awareness through a DVD-based video training program taken by 2,641 employees.

In recent years, stronger compliance management has become a carefully watched public issue amid a spate of corporate scandals. In response, the Group held compliance training for 33 executive officers including the president. An outside attorney was invited to conduct the training session.



New employee training

To teach employees about insider trading rules prescribed by the Financial Instruments and Exchange Law, an easy-to-understand e-learning program was also rolled out and taken by 967 employees.

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.

Import/Export Control Initiatives

The Logistics Division is primarily in charge of import and export matters for the Minebea Group. The division creates procedural manuals and guides for adhering to the Customs Law and other regulations and provides a management structure to ensure compliance. 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, including for overseas subsidiaries, and will continue working to implement more efficient and effective compliance-related educational activities.

The Group will also continue to implement training on legislation such as antitrust laws, striving to prevent violations before they occur.

For further 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>)