

MinebeaMitsumi Group Code of Conduct

MinebeaMitsumi Inc.

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I . DECLARATION

In recent years, a corporation has been required to be not only an organization that pursues profits through free and fair competitions but also an entity that broadly provides usefulness to the society. Under these circumstances, compliance (observance of laws and ethical principles) is regarded as an important element of business management. In addition, a corporation has been required to be fair and sincere to its stakeholders from the viewpoint of corporate governance. In other words, a company has duties to fulfill its social responsibility and improve its corporate value not only by complying with laws and regulations but also, as a corporate citizen, by conducting appropriate and fair business management based on corporate ethics.

MinebeaMitsumi Group has upheld “The Five Principles” as the Company Credo: “Be a company where our employees are proud to work”, “Earn and preserve the trust of our valued customers”, “Respond to our shareholders' expectations”, “Work in harmony with the local community”, and “Promote and contribute to global society”. We have clarified that an earnest and serious attitude toward our stakeholders such as shareholders, customers, business partners, employees, government agencies, and the society is a fundamental building block of our business. We have also strived to achieve highly transparent management.

Since the foundation in 1951, MinebeaMitsumi has been one of the most active forerunners in promoting global operation presence. Through that period, compliance with laws has been implemented as a matter of course in our group both domestically and internationally. Our efforts to promote employment and foster human resources have also contributed to local communities. Furthermore, we have fulfilled our social responsibility through environmental protection efforts such as obtainment of ISO14001 for all our production sites around the world as well as through efforts to promote labor safety and health in which we have obtained OHSAS18001 for factories mainly in Asia.

From now on and in the future, MinebeaMitsumi, as a corporate citizen, needs to steadily continue to conduct appropriate activities. To this end, specific code of conduct are essential to enable each director and employee of our group to correctly understand ethical issues, laws and regulations, and social requirements and select appropriate activities at all time.

Consequently, we hereby declare our commitment to continuously strive to understand corporate ethics and applicable laws, harmonize with society, and achieve sustained improvement of corporate value through fair and appropriate business management by ensuring implementation of MinebeaMitsumi Group Code of Conduct.

Each director and employee of our group is required to fully comprehend the purpose and comply with MinebeaMitsumi Group Code of Conduct.

January 27, 2017

MinebeaMitsumi Inc.

Representative Director, President and Chief Executive Officer

Yoshihisa Kainuma

II. CODE OF CONDUCT

1. LABOR

The MinebeaMitsumi Group is committed to upholding the human rights of employees, and to treating them with dignity and respect. All MinebeaMitsumi Group companies shall adhere to the following standards regarding use of labor:

(1) Freely Chosen Employment

Forced, bonded, indentured, or involuntary and inhuman prison labor shall not be used. All work shall be voluntary, and MinebeaMitsumi employees shall be free to leave upon reasonable notice in compliance with applicable law, regulation, and contractual agreement. MinebeaMitsumi employees shall not be required to hand over government-issued identification, passports, or work permits as a condition of employment.

(2) No Child Labor

Child labor shall not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. MinebeaMitsumi supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations. MinebeaMitsumi employees under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.

(3) Discrimination

The MinebeaMitsumi Group is committed to a workforce free of harassment and discrimination. MinebeaMitsumi Group companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, employees or potential employees should not be subjected to medical/pregnancy tests that could be used in a discriminatory way.

(4) Harsh or Inhumane Treatment

MinebeaMitsumi Group companies shall not allow any harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees, nor shall the threat of any such treatment be allowed.

(5) Minimum Wages

Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Any disciplinary wage deductions are to conform to applicable law and regulation. The basis on which employees are paid shall be clearly communicated to them in a timely manner.

(6) Working Hours

Work weeks are not to exceed the maximum set by applicable law and regulation. Employees should be allowed at least one day off per seven-day week.

(7) Freedom of Association

The MinebeaMitsumi Group respects the rights of its employees to associate freely, join labor unions, seek representation, and or join workers' councils in accordance with applicable law and regulation. Employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

2. HEALTH AND SAFETY

The MinebeaMitsumi Group recognizes that the quality of its products and services, consistency of production, and employee morale are enhanced by a safe and healthy work environment. All MinebeaMitsumi Group companies shall adhere to the following standards regarding health and safety:

(1) Machine Safeguarding

Physical guards, interlocks and barriers for machinery used by employees shall be provided where appropriate, and shall be properly maintained.

(2) Industrial Hygiene

Employee exposure to chemical, biological and physical agents shall be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, employees shall be provided with appropriate personal protective equipment.

(3) Safety

Employee exposure to workplace safety hazards shall be identified, evaluated, and controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures. Where hazards cannot be adequately controlled by these means, employees shall be provided with appropriate personal protective equipment.

(4) Emergency Preparedness and Response

Emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency response and recovery plans and procedures.

(5) Occupational Injury and Illness

Procedures and systems shall be implemented to manage, track and report occupational injury and illness, including provisions to:

- a) encourage worker reporting;
- b) classify and record injury and illness cases;
- c) provide necessary medical treatment;
- d) investigate cases and implement corrective actions to eliminate their causes; and,
- e) facilitate return of employees to work.

(6) Physically Demanding Work

Employee exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated and controlled. Employees shall be provided with appropriate equipment to perform such tasks.

(7) Dormitory and Canteen

Workers shall be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the MinebeaMitsumi Group shall be clean, safe, and provide emergency egress, adequate heat and ventilation, and reasonable personal space.

3. ENVIRONMENT

The MinebeaMitsumi Group recognizes that environmental responsibility is integral to producing world class products. In our operations, adverse effects on the environment and natural resources shall be minimized while safeguarding the health and safety of the public. All MinebeaMitsumi Group companies shall adhere to the following standards regarding the environment:

(1) Product Content Restrictions

All products shall adhere to applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances, including labeling laws and regulations for recycling and disposal.

(2) Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released to the environment shall be identified and managed to ensure their safe handling, movement, storage, recycling or reuse, and disposal.

(3) Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities shall be monitored, controlled, and treated as required by applicable law and regulation.

(4) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations shall be characterized, monitored, controlled, and treated as required by applicable law and regulation.

(5) Environmental Permits and Reporting

All environmental permits and registrations required by applicable law and regulation shall be obtained, maintained, and kept current. The operational and reporting requirements of all permits and registrations shall be followed.

(6) Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, are to be reduced or eliminated to the extent practicable at the source or by practices such as modifying production, maintenance, and facility processes, materials substitution, conservation, recycling, and or re-using materials.

4. ETHICS AND BUSINESS PRACTICE

To meet our social responsibilities and to increase our corporate value, The MinebeaMitsumi Group are to uphold the highest standards of ethics including:

(1) No Corruption, Extortion, or Embezzlement

The highest standards of integrity shall be maintained in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited. Any such conduct may result in termination and legal action.

(2) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

(3) No Improper Advantage

Bribes or other means of obtaining undue shall not be offered or accepted.

(4) Fair Business, Advertising, and Competition

Standards of fair business, advertising, and competition are to be upheld. Customer information shall be safeguarded.

(5) Community Engagement and International Operation

Community engagement is encouraged to help foster social and economic development. The MinebeaMitsumi Group, as an international corporation, contributes to the development of the community in every country in which we operate by not only complying with the laws and rules of each country, but also by respecting its history, culture and customs.

(6) Protection of Intellectual Property

The MinebeaMitsumi Group respects intellectual property rights and implements proper measures to protect others' intellectual rights. To protect those rights, the Group also pays full attention to transferring and handling our or others' technologies or know-how.

(7) Fair Stock Trading

In accordance with applicable laws, regulations, and company rules, no insider information obtained in the course of work is to be used or leaked for improper advantage in stock trading. The MinebeaMitsumi Group does not engage in unfair or improper stock trading with shareholders or investors.

(8) Import/Export

Compliance with not only the laws and rules of each country but also all applicable international rules, regulations, and trade agreements shall be maintained when trading products or materials with, or providing technological assistance to, foreign countries. Appropriate management systems and procedures shall be maintained to assure compliance.

(9) Response to Antisocial Forces

The MinebeaMitsumi Group has no relations with any antisocial forces that may or will pose a threat to the public order and/or safety. At the same time, regarding unreasonable demands, if any, from such forces, without making compromises, the Group shall cooperate with external specialized institutions, including police and lawyers, and deal with such demands in a resolute attitude.

III. MANAGEMENT SYSTEM

1. ROLE OF THIS CODE OF CONDUCT

This Code of Conduct is one of the important tools for practicing Compliance based on the company policy. We assure all the stakeholders that, by practices based on the system described below, we will carefully follow the guidelines set out in This Code of Conduct.

2. STRUCTURE OF COMPLIANCE

(1) Chief Officer of Compliance

Representative Director, President and Chief Executive Officer of MinebeaMitsumi Inc. takes a role of the chief officer of the compliance system of MinebeaMitsumi group.

(2) Compliance Committee

The Compliance Committee, a body to promote Compliance including This Code of Conduct, is established directly under the President of MinebeaMitsumi Inc.

The Compliance Committee assumes the operation of this Code of Conduct, approved by the Board of Directors, and takes a role of making decisions to address urgent requirements when a serious violation of the compliance occurs.

A secretariat for the Compliance Committee shall be the Compliance Office. The secretariat functions as an organ to execute and promote measures approved by the Compliance Committee. It also function as the secretariat for the body that makes decisions to address urgent requirements when a serious violation of the compliance occurs.

(3) Application to Each Company of Our Group and Supply Chain

This Code of Conduct is to be circulated by the MinebeaMitsumi Inc. to each company of our group. Each company is required to take necessary compliance measures in accordance with This Code of Conduct.

Moreover, efforts shall be made to voluntarily observe this Code of Conduct in

the MinebeaMitsumi Group's supply chain, and each Group company shall request as appropriate that its suppliers and subcontractors agree to and implement this Code of Conduct.

(4) Addition of Detailed Guidelines

When putting This Code of Conduct into practice, while some detailed guidelines have been already stipulated, new detailed guidelines may be added according to specific requirements. We must comply not only with This Code of Conduct but also with such new detailed guidelines.

(5) Duty to Report

When you are not sure if your acts or decisions violate This Code of Conduct, it is your duty to consult your superiors, the competent departments or the consultation service separately designated by the Company.

Also, when you notice any violation of This Code of Conduct by a director or an employee, you must immediately report to the Compliance Office and the Personnel & General Affairs Headquarters or the consultation service designated by the Company.

We ensure that every aspect of the privacy, such as his/her name and the content of the above-mentioned consultation, will be kept secret. We also ensure that he/she will not be disadvantaged due to such consultation.

(6) Penalty

In case of violating This Code of Conduct, one will be subjected to disciplinary action according to the company rules. When the act of violation causes damage to the company, he/she may be required to indemnify the company for the loss.

One who violates This Code of Conduct for the following reasons will not be exempt from responsibility.

- ①Lack of knowledge on laws and regulations
- ②Absence of intention to violate the laws and regulations
- ③Intention to act for the benefit of the company

(7) Education and Training

Based on This Code of Conduct, education and training concerning compliance

are conducted for the following purposes. The employees who are ordered to participate in the training by the Compliance Committee, the secretariat, or an immediate supervisor must not refuse or fail to attend the training without legitimate reasons.

①To increase the awareness of overall compliance issues such as laws and regulations as well as corporate ethics.

②To provide accurate knowledge of This Code of Conduct and various office regulations.

(8) Audit

Each company of our group is required to conduct regular internal audits in accordance with This Code of Conduct to ensure none of the company activities violates the compliance manual.

With the cooperation of each related department, the secretariat, according to the specific requirements, is to conduct audit to find out if there is any acts of violation of the compliance within our group. The secretariat is then required to report the result of the audit to the Compliance Committee. It also orders the concerned department/section to correct its inadequate operation if necessary.

3. SUPPLEMENTARY PROVISION

(1) Revision

This Code of Conduct is revised when the Board of Directors of the Company approves the draft prepared by a secretariat.

(2) Enactment and Amendment

Enactment: October 3, 2005

Amendment: May 1, 2008

Amendment: July 1, 2009

Amendment: June 1, 2012 (the name of applicable Div. and Dept.)

Amendment: November 27, 2015 (the name and expression of five rules)

Amendment: September 2, 2016 (the name of applicable Div.)

Amendment: January 27, 2017 (the name of Company)