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? 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.

Minebea Group has upheld five rules as basic management principles: "Be a company of which employees are proud to be a part", "Gain the trust of customers", "Meet the expectation of shareholders", "Be welcomed by the local community", and "Contribute to the international community". 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, Minebea 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, Minebea, 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 Minebea Group Code of Conduct.

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

July 1, 2009

Minebea Co., Ltd.

Representative Director, President and Chief Executive Officer

Yoshihisa Kainuma

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? CODE OF CONDUCT

1. LABOR

The Minebea Group is committed to upholding the human rights of employees, and to treating them with dignity and respect. All Minebea 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 Minebea employees shall be free to leave upon reasonable notice in compliance with applicable law, regulation, and contractual agreement. Minebea 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 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. Minebea supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations. Minebea 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 Minebea Group is committed to a workforce free of harassment and discrimination. Minebea 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

Minebea 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 Minebea 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 Minebea 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 Minebea 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 Minebea Group shall be clean, safe, and provide emergency egress, adequate heat and ventilation, and reasonable personal space.

3. ENVIRONMENT

The Minebea 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 Minebea 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 Minebea 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 Minebea 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 Minebea 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 Minebea 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 Minebea 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.

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? . 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 Minebea Co., Ltd. takes a role of the chief officer of the compliance system of Minebea group.

(2) Compliance Committee

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

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, CSR Promotion Division. 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 Minebea Co., Ltd. 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 Minebea 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, CSR Promotion Division and the Personnel & General Affairs Dept., Operations & Planning Division 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.

1. Lack of knowledge on laws and regulations
2. Absence of intention to violate the laws and regulations
3. Intention 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.

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

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Minebea Group Officer and Employee Compliance Guidelines

?. Declaration

We established the "Minebea Group Code of Conduct" in 2005, with the goal of maintaining proper conduct as a corporate citizen. We have requested the officers and employees of the Minebea Group to comply with the Code and have expressed our attitude widely to our shareholders, customers, employees, local communities and clients.

We hereby further establish detailed rules regarding the "Minebea Group Code of Conduct". With these rules, we intend to even more strongly assure that all officers and employees of the Minebea Group share the values and morals provided for in the "Minebea Group Code of Conduct" and put the Code into practice, with the recognition that compliance in a corporation is sustained by each of its officers and employees and that this is an era when more and more consciousness and responsibilities are required of each member of a corporation in addition to actions by the corporation itself.

To begin with, I, as a person in charge of compliance for our group, hereby declare that I will comply with these rules and become a good example to the officers and employees of the Minebea Group. I request all the Minebea Group officers and employees to understand the spirit of these rules and comply with them in accordance with my declaration.

October 1, 2010
Minebea Co., Ltd.

Representative Director, President and Chief Executive Officer
Yoshihisa Kainuma

?. Compliance Guidelines

These "Minebea Group Officer and Employee Compliance Guidelines" ("the Guidelines") are provided as the standards of conduct with which all officers and employees of the Minebea Group must comply. All officers and employees of the Minebea Group ("We") shall read, understand and comply with the Guidelines.

Compliance

1. Compliance with laws and regulations and internal company rules, and conduct of ethical business activities

We shall confirm, understand and comply with all laws and regulations, internal company rules relevant to our business operations based on the fact that one of the primary management policies of the Minebea Group is to conduct ethical business activities while complying with applicable laws and regulations in each country or region where we conduct the business activities. In addition, we shall not carry out business operations that are contrary to corporate ethics.

2. Maintenance of credibility and reputation of the Minebea Group

We shall endeavor to maintain the credibility and reputation of the Minebea Group, and shall not carry out any act that would lead to the damage of its credibility or reputation.

Diversity

3. Respect for culture and customs in each country and region

The Minebea Group has been expanding its business globally. We shall endeavor to conduct business operations respecting the culture, customs and history of each country and region.

Labor

4. Respect for fundamental human rights

In performing our duties for the Company, we shall respect the fundamental human rights of all related persons, and shall not discriminate against those persons based on their sex, age, birthplace, nationality, race, ethnicity, creed, religion, disease, disability or other personal attributes.

5. No harassment

We shall not commit any kind of harassment (including sexual harassment and power harassment (harassment by supervisors)).

6. Realization of work-life balance

We shall mutually respect ways of working that suit individual life styles, and shall aim to realize work-life balances.

Health and safety

7. Maintenance of healthy and safe workplace

We shall comply with laws and regulations related to labor, and endeavor to maintain a healthy workplace environment. In addition, we shall comply with internal company rules regarding safety and health in the workplace and endeavor to prevent occurrence of occupational injury and illness, and if any injury or illness should occur, we will immediately report it in accordance with the prescribed procedures. We shall endeavor to prevent mental health problems by respecting each other's opinions and creating a workplace with an open atmosphere.

Environment

8. Business activities that consider the environment

We shall comply with environmental laws and regulations and internal company rules, and endeavor to reduce as much as possible, at all stages of business activities, environmental risks such as environmental burdens and pollution problems resulting from consumption and other uses of energies and resources.

Ethics and business practice

9. Timely and appropriate disclosure of information

We shall appropriately disclose company information (including business conditions and product information) to our customers, shareholders and investors on a timely basis.

10. Protection of confidential and personal information

We shall use confidential information of the Company, confidential information of other companies that we obtain from business partners, and personal information of our customers, employees, and other persons, solely in accordance with laws and regulations, internal company rules, and shall not divulge confidential or personal information.

11. No offering of bribes

We shall not offer bribes or other means of obtaining undue favor and we shall also not accept them. In addition, we shall not commit any act of bribery or any other act that is against the law or in violation of good business morals and practice for the purpose of obtaining illicit profits in business from persons with public positions such as members of the National Diet, public officials or foreign public officials.

12. Ensuring fair trade and competition

We shall comply with laws and regulations regarding free and fair competition and trade in each country and region, and shall conduct fair business activities.

13. Protection of intellectual property

We understand the importance of intellectual property in modern society and shall endeavor to protect the Company's rights and take great care not to infringe on the rights of other companies.

14. Prevention of insider trading

We shall not sell or purchase shares, corporate bonds or other securities through insider trading or in any other way that could be misconstrued as insider trading.

15. Appropriate procedures for import and export, etc. of products and materials, etc.

We shall comply with relevant laws and regulations (including import and export laws and regulations) and internal company rules and follow appropriate procedures when we export and import products, materials, machinery equipment, etc., and when we execute technical license agreements.

16. Response to antisocial forces

We shall take a resolute attitude toward antisocial forces and groups that pose a threat to the order and safety of civil society, and shall sever any relations with those forces and groups.

17. Protection of company assets

We shall carefully use company assets and expenses in accordance with internal company rules, and shall not use them wastefully or for personal purposes.

18. No conflicts of interest

We shall not commit any act from which we or third parties would benefit at the sacrifice of the fair profits of the Company.

Social contribution

19. Provision of useful products for society

We shall endeavor to develop and provide products that will contribute to the (sustainable) development of (the economy and) society including maintenance of the global environment, such as products that promote technical innovation to reduce input of resources and energies, products with excellent durability, and recyclable products. In addition, we shall take a stance to faithfully listen to the voice of our customers and consumers, and endeavor to ensure the safety and quality of our products and services.

20. Contribution to local community

The Company, as a good corporate citizen, shall endeavor to realize a better society. Every one of us shall consider social contribution, and endeavor to contribute to society.

Coexistence with international society

21. Compliance with international rules and contribution to local community

When we are involved in businesses in other countries and regions, we shall not only comply with international rules and local laws and regulations, but shall also understand the circumstances in their local communities and endeavor to contribute to their development.

Compliance structure

22. Internal reporting

If we recognize (i) any act in breach of laws or regulations, internal company rules or any of the similar regulations of the Minebea Group including the Guidelines, (ii) any act that is problematic for corporate ethics, or (iii) any act suspected to be (i) or (ii), we shall immediately report to or consult our superiors, the relevant departments, or other internal avenues of communication services regarding the matter.

? Penalties

A breach of the Guidelines may be subject to disciplinary action under each Minebea Group Company's internal rules such as the Employee Handbook.

SUPPLEMENTARY PROVISION

(1) Revision

The Guidelines are revised when the Board of Directors of the Company approves the draft prepared by the Compliance Promotion Office.

(2) Enactment and Amendment

Enactment: October 1, 2010

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