

MinebeaMitsumi

Passion to Create Value through Difference

MinebeaMitsumi Inc.

3-9-6 Mita, Minato-ku,

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Phone:(81)3-6758-6711 Fax:(81)3-6758-6700

<http://www.minebeamitsumi.com/english/>

Date: 10 May 2021

A/To: Ms. Beatriz Balbin

Chief

Special Procedures Branch

Office of the High Commissioner for Human Rights

Fax: +41 22 917 9008

De/From: Yoshihisa Kainuma

Representative Director, CEO & COO

MinebeaMitsumi Inc.

Contact: Minoru Makita

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Your Ref: AL OTH 135/2021

Subject: JOINT COMMUNICATION FROM SPECIAL PROCEDURES

Dear Ms. Beatriz Balbin,

Regarding your "JOINT COMMUNICATION FROM SPECIAL PROCEDURES" dated March 12, 2021(hereinafter the "Letter"), which was addressed to myself, Yoshihisa Kainuma as the representative of MinebeaMitsumi Inc. and was sent by fax to MITSUMI ELECTRIC CO., LTD., I have the honor of reporting the followings on behalf of the MinebeaMitsumi Group including MITSUMI ELECTRIC CO., LTD.

Our corporate philosophy is to contribute to society by "Producing better products, with faster speed, in larger numbers, at lower cost and by smarter means." The Minebeamitsumi Group's company credo, "The Five Principles" is as below. We give instruction and training of "The Five Principles" seriously to all of our officers and employees from the first day that they join.

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- (1) Be a company where our employees are proud to work
- (2) Earn and preserve the trust of our valued customers
- (3) Respond to our shareholders' expectations
- (4) *Work in harmony with the local community*
- (5) Promote and contribute to global society

Based on these company credos, our basic management policy is to fulfill our social responsibility and to maximize the corporate value for our various stakeholders, such as shareholders, business partners, local communities, global society and employees. Especially, in order to accomplish (4) *Work in harmony with the local community* and (5) *Promote and contribute to global society*, of the "The Five Principles", we consider the protection of human rights is essential and we have paid the utmost attention to SDGs.

Answer to Question 1

The MinebeaMitsumi Group recognizes that there is no fact that it purchases from companies which allegedly violate human rights and that it is not involved in human rights violations through its supply chain as pointed out in the Letter.

For the avoidance of doubt, we understand that the information you have received that the MinebeaMitsumi Group may be involved through its supply chain in alleged forced labor, arbitrary detention, and trafficking of persons of Uyghur and other minority workers is based on the statement in a certain report that the name of MITSUMI ELECTRIC CO., LTD (MITSUMI), one of the MinebeaMitsumi Group companies, was listed as a business partner on the website of the parent company of the company that is alleged to have transferred the Uyghurs from Xinjiang in 2018.

However, as a result of our internal investigation, the MinebeaMitsumi Group confirms that there is no business relationship with the relevant company.

We purchased parts from the parent company of the relevant company in 2013 (the total purchase amount was 3 million yen, which is approximately 0.0006% of our amount of the annual purchase, 520 billion yen), but we have not had any transactions with it since 2014.

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As described below, our suppliers are obliged to respect the human rights of their employees and treat them with dignity as a condition of the transactions with us, and the MinebeaMitsumi Group recognizes that it is not involved in human rights violations through the supply chain.

Answer to Question 2

In January 2012, the MinebeaMitsumi Group reiterated its support for the United Nations Global Compact (UNGC), and participated every time in the Human Rights Education Subcommittee (held seven times in fiscal 2020) held by UNGC to promote human rights education and training within its group.

"MinebeaMitsumi Group Code of Conduct" stipulates (1) Freely Chosen Employment (including prohibition of forced labor), (2) No Child Labor, (3) Prohibition of Discrimination, (4) Prohibition of Harsh or Inhumane Treatment, (5) Minimum Wages, (6) Working Hours, and (7) Freedom of Association.

In addition, "MinebeaMitsumi Group Officer and Employee Compliance Guidelines" states clearly "Respect for fundamental human rights" and that we shall respect fundamental human rights of all related persons, and shall not discriminate against those persons based on race, age, gender, nationality, religion, etc.

To ensure thorough implementation of these measures, we have established the Compliance Committee, which oversees the compliance efforts of the MinebeaMitsumi Group in a cross-sectional manner. At the same time, the Committee provides ongoing education to all officers and employees on compliance, including respect for fundamental human rights.

Specifically, we conduct compliance awareness surveys biennially to gauge employees' understanding of compliance and based on the results of the surveys, we confirm that there are no problems with awareness or interest of employees in compliance. In addition to compliance training for officers and employees, which includes training by outside instructors, rank-based training and training at the time of mid-career hiring, we also conduct e-learning-based training which includes tests to check understanding in an effort to enhance a sense of compliance among officers and employees.

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In relation to our suppliers, similar to "MinebeaMitsumi Group Code of Conduct", we conduct risk assessments based on "MinebeaMitsumi Group CSR Procurement Promotion Check Sheet" as well as obligating all suppliers to comply with the "CSR Procurement Guidelines" including following provisions: (1) Freely Chosen Employment (including prohibition of forced labor), (2) No Child Labor, (3) Prohibition of Discrimination, (4) Prohibition of Harsh or Inhumane Treatment, (5) Minimum Wages, (6) Working Hours, and (7) Freedom of Association. If an investigation suspects or reveals a violation of human rights, such as forced or compulsory labor, we will immediately investigate the facts and in case we cannot confirm there is no human rights violation we will suspend or cancel the transaction as soon as possible.

We note that these our initiatives align with the "National Action Plan on Business and Human Rights" by the Japanese government.

Answer to Question 3

The MinebeaMitsumi Group conducts risk assessment in the supply chain.

Specifically, the Minebea Mitsumi Group has established "MinebeaMitsumi Group CSR Procurement Promotion Check Sheet" which consists of 54 questions in five areas: "General Promotion of Corporate Social Responsibility (CSR) at your company", "Labor" "Health and Safety", "Environmental Conservation", and "Ethics and Business Practice". The questions in "Labor" consist of (1) Freely Chosen Employment (including the check item "We do not use forced, bonded or indentured labor or involuntary and inhumane prison labor."), (2) No Child Labor, (3) Prohibition of Discrimination, (4) Prohibition of Harsh or Inhumane Treatment, (5) Minimum Wages, (6) Working Hours, and (7) Freedom of Association.

To date, this has been distributed to approximately 2,000 of our major suppliers, and the responses have been collected from all of them and we have not found any issues.

In order to further ascertain that our suppliers are not involved in human rights violation, the MinebeaMitsumi Group is planning to send "MinebeaMitsumi Group CSR Procurement Promotion Check Sheet" to all of our suppliers which we have continuous transactions, and to request them to submit a letter of commitment that they comply with "CSR Procurement

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Guidelines", they request their supply chains to comply with it and that they recognize there is no violation of it by themselves or their supply chains. In addition, in case where human rights violation is suspected, the MinebeaMitsumi Group will conduct third-party audits as necessary.

Answer to Question 4

For directors and employees of the MinebeaMitsumi Group, as described in 2 above, "MinebeaMitsumi Group Code of Conduct" and "MinebeaMitsumi Group Officer and Employee Compliance Guidelines" are stipulated, and compliance training is regularly conducted to raise awareness of compliance among officers and employees. In addition, as described in 7 below, the whistleblowing system has been established.

As described in 2 above, we conclude a business contract with suppliers on the condition that they comply with "CSR Procurement Guidelines", which includes provisions that specifically prohibit forced or compulsory labor.

In addition to "MinebeaMitsumi Group CSR Procurement Promotion Check Sheet" and "CSR Procurement Guidelines", as described in 3 above, we will request our suppliers to submit the letter of commitment and conduct third-party audits as necessary.

Answer to Question 5

First of all, as described in 1 above, the MinebeaMitsumi Group recognizes that there is no purchase from companies suspected of violating human rights and that there is no involvement in human rights violations through the supply chain as pointed out in the Letter.

In the event of a breach of "CSR Procurement Guidelines" by a supplier, or as a result of risk assessment based on "MinebeaMitsumi Group CSR Procurement Promotion Check Sheet" or local investigation, if a violation of human rights, such as forced labor, is suspected, we will conduct third-party audits as necessary and immediately investigate the facts and in case we cannot confirm there is no human rights violation we will suspend or cancel the transaction as soon as possible

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Answer to Question 6

First of all, as described in 1 above, the MinebeaMitsumi Group recognizes that there is no purchase from companies suspected of violating human rights and that there is no involvement in human rights violations through the supply chain pointed out in the Letter. For this reason, the MinebeaMitsumi Group has not reported any human rights violations to the authorities concerned.

To prevent from being involved in any violations of human rights in the future, when any violation of human rights such as forced labor is suspected, we will conduct third-party audits as necessary and immediately investigate the facts and in case we cannot confirm there is no human rights violation we will suspend or cancel the transaction as soon as possible.

Answer to Question 7

The MinebeaMitsumi Group has established internal and external whistleblowing system 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.

Answer to Question 8

The MinebeaMitsumi Group has established whistleblowing system at each company as appropriate in light of the laws and business environment of each country. For example, in China, we have incorporated rules for whistleblowing system into working rules, and are responding appropriately to complaints and allegations of improprieties. We consulted with the local authorities regarding the establishment of such rules.

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