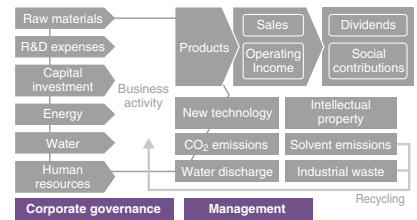


# Compliance and Human Rights

## In order to fulfill our social responsibility, the Nitto Denko Group implements a number of activities.



### Issuance and Distribution of "Business Conduct Guidelines"

"Business Conduct Guidelines" are the principles that we should abide by. That is, concrete actions adhering to our "Corporate Vision" and "Guiding Principles" are described in them.

The Guidelines have been translated into 16 different languages for employees around the world to read, and have been distributed to all employees of the Nitto Denko Group.



"Business Conduct Guidelines"

### Activities for Internalizing CSR

For sound management, it is indispensable for every employee of the Nitto Denko Group to understand the "Business Conduct Guidelines". We explain them to employees when they join our Group.

### CSR Workshops for management-level employees

We conduct annual "CSR Workshops" for management-level employees and supervisors. In the Workshops we consider "governance," "compliance," "crisis & risks" and "communication" together, enhancing awareness of CSR.

In fiscal 2012, the Workshops were held at 87 bases throughout the world.



A workshop was held for the first time at Nitto Denko America Latina in Brazil, where a new factory is under construction and the work environment is hectic.



A Workshop was held at Taiwan Nitto Optical, where a CSR committee is regularly convened and proactive actions taken.

### Reporting and Counseling System on Corporate Ethics

We have an in-house reporting and counseling system using e-mail, which is available to every employee.

When any violation of the law or ethics, any disservice to the public, or any corruption is uncovered, the first step undertaken is for the employee to inform and consult their manager or any divisions involved. In cases where the situation is not resolvable or urgent, it is then likely for the employee to contact the CSR Department directly.

In fiscal 2012, there were ten or so employees who utilized the system. We settle issues while ensuring the protection of whistleblowers.

### Human Rights Activities

The Nitto Denko Group has introduced a "Basic Policy on Human Rights," as described below and implores every employee in the Group to conduct business activities while respecting the human rights of each other.

Each domestic base calls for slogans and conducts training sessions along with an annual Human Rights Week in November.

In addition, we participate in an activity as a member of The Corporate Federation for Dowa and Human Rights Issue, Osaka, where corporations work toward solutions of human rights issues from a corporate standpoint.

In fiscal 2012, we introduced a policy across the whole group on the handling of conflict minerals\*, which have become controversial in recent years.

\* In the Democratic Republic of Congo and neighboring countries, domestic conflicts accompanied by serious human rights violations have occurred. It is said that armed groups obtaining money from mining have a hand in the conflicts.

### Nitto Denko Group Basic Policy on Human Rights

As a member of society, we at the Nitto Denko Group will, while applying ourselves to the development of our business, fulfill our social responsibilities with integrity and give due consideration to human rights, the environment, and communities.

- We will ensure that every employee respects human rights in their work as we foster a culture that encourages open communication in accordance with the guiding principles of "Open, Fair and Best."
- We will not discriminate against any employee based on race, color, gender, language, religion, belief, nationality, origin, age, or physical or mental disabilities.
- We will take every opportunity to educate employees on human rights so that we may remain a trustworthy member of society.