

Approved by:		NMB-HR-POL091	
 M.N Stansfield Managing Director		 <b>United Kingdom</b> Human Resources Policy	
Effective Date: 10.04.2019			
<b>Subject: Conflict Minerals Policy Statement</b>			
Iss1	Original Issue	31 March 2016	C Bennett
Iss2	Annual review & change to corporate name & logo	18-August 2018	C Bennett
Iss3	Annual review & updated format	10-April 2019	C Bennett

**NMB-Minebea UK Ltd** supports efforts to end the violence and human rights violations involved in the mining of gold, tin, tantalum and tungsten (3TG) Conflict Minerals, including derivatives such as cassiterite, columbite-tantalite, and wolframite, from the "Conflict Region" of Africa comprised of the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries.

The United States Congress enacted the Dodd Frank Act which includes Section 1502 the "Act", requiring US manufacturers to file reports with the US Security and Exchange Commission (SEC), disclosing whether the products they manufacture or contract to manufacture contain "Conflict Minerals" that are "necessary to the functionality or production" of those products. The goal of this legislation is to stem the flow of income to the combatants in this war-torn region.

NMB-Minebea UK Ltd is committed to achieving compliance with this legislation and its requirements.

NMB-Minebea UK Ltd Policy on Conflict Minerals:

1. NMB-Minebea UK Ltd will not knowingly procure Conflict Minerals from the DRC Region unless they are certified as "Conflict Free".
2. NMB-Minebea UK Ltd will undertake reasonable due diligence to ensure compliance with these requirements, and require that our suppliers and subcontractors undertake reasonable due diligence within their supply chains to ensure their compliance. Such due diligence efforts include, but are not limited to, requiring relevant suppliers to provide written evidence documenting that raw materials and those used in the manufacture of components and products supplied to NMB-Minebea UK Ltd originate from outside the DRC Region or are certified as "Conflict Free" by an independent third party.

This policy is not contractual and is not intended to create legal rights or duties independent of those that arise under contracts entered into by NMB-Minebea UK Ltd or under the laws of the jurisdictions in which NMB-Minebea UK Ltd conducts business.

NMB-Minebea UK Ltd reserves the right to revise this Policy at any time.