

# Conflict Minerals Survey Manual

## Ver.2.0

Nidec Group  
July 2014



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# Introduction

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Nidec Corporation supports the goals of the U.S. Conflict Minerals Law in promoting socially and environmentally responsible procurement of materials used in our production processes and, specifically, in restricting the use of conflict minerals that are tantalum, tin, tungsten and gold mined in the Democratic Republic of Congo (“DRC”) or adjoining countries.

Although the origin of mineral content is often difficult to trace, due to the complex paths of processing, refining and fabrication that bring materials to us, we are committed, without compromise, to prohibiting the use of materials that enter the marketplace at the cost of severe human rights abuses, such as those reported in some areas of the DRC.

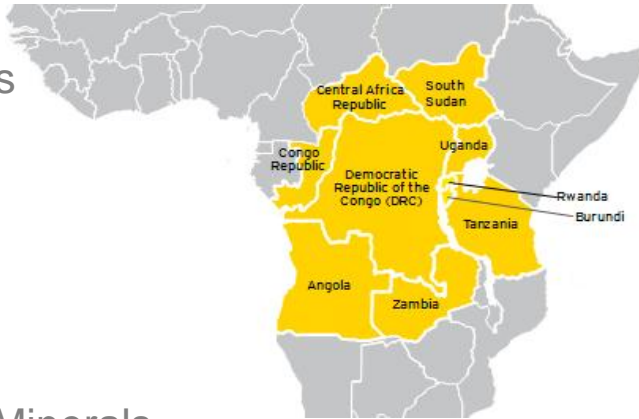
As a listed company on the New York Stock Exchange and a socially responsible company, Nidec does not use conflict minerals. It actively encourages its vendors to adopt similar restrictions, offers guidance to them in establishing and maintaining a verification process for the origin of materials, and is pledged to discontinue purchase of products that contain conflict minerals.

# 1. Conflict Minerals Survey – Background and Objectives

# 1-1.Conflict Minerals Overview

There is concern that some of the minerals produced in the Democratic Republic of the Congo and nine adjoining countries (Covered Countries) are funding armed groups committing acts of extreme violence, contributing to an urgent humanitarian situation.

## ● Covered Countries



1. Democratic Republic of Congo,
2. Republic of the Congo,
3. Central African Republic,
4. Tanzania,
5. South Sudan,
6. Burundi,
7. Zambia,
8. Rwanda,
9. Angola,
10. Uganda

## ● Conflict Minerals

- Under the Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act enacted in the United States, the four minerals below are considered “conflict minerals.”

Conflict Minerals	% Produced in Covered Countries	Major Uses
Tantalum	15-20%	Capacitors and other electronic components for cellphones, computers and TVs, etc., carbide tools
Tin	Approximately 5%	Pipe welding and electronic circuit board soldering
Gold	Approximately 0.5%	Jewelry and electronics, communications and aerospace industry machinery
Tungsten	Approximately 0.5%	Lighting, electronic/electrical machinery, electrodes, contact shoes

# 1-2. Conflict Minerals Disclosure Requirements

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- To address concerns over conflict minerals, the United States Congress enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") in 2010. (Section 1502 of this act stipulates Conflict Minerals disclosure requirement )
- Companies listed on US stock exchanges must disclose the use of conflict minerals in their products (whether or not those minerals fund armed groups) to the Securities and Exchange Commission (SEC).
- Announced in 2012, the SEC final rule requires companies to survey and disclose the use of conflict minerals.

**Companies with Disclosure Obligations:**

Companies, listed on US stock exchanges (SEC-reporting companies) that manufacture or contract to manufacture products requiring conflict minerals, are subject to disclosure requirement. Therefore **Nidec Group is subject to this requirement.**

**Survey/Reporting Period:** January 1 - December 31 (To be performed for each calendar year )

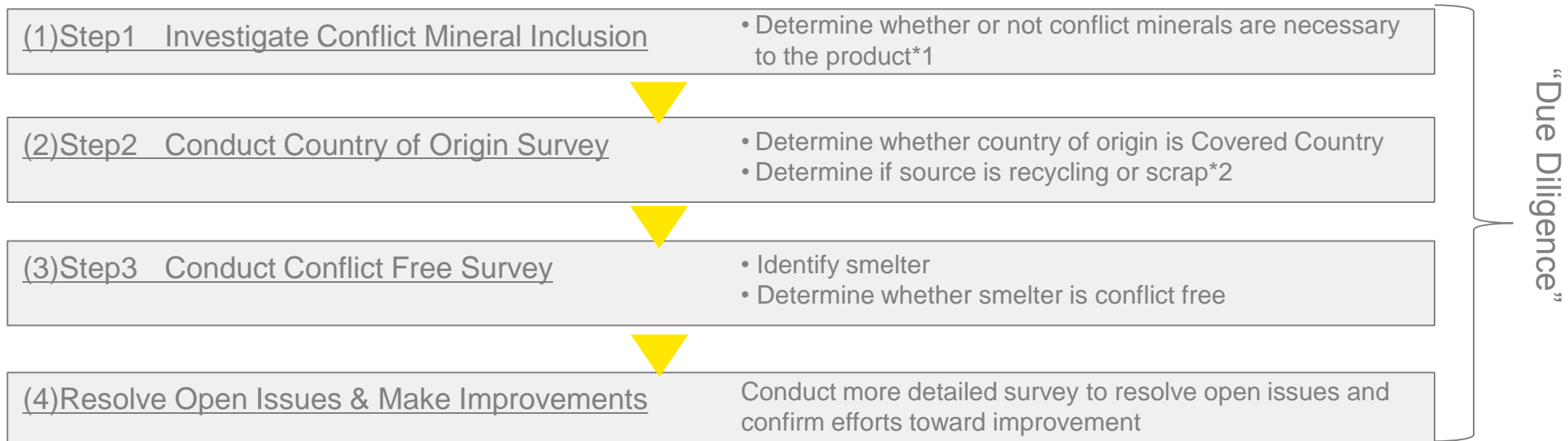
# 1-3. Conflict Minerals Survey and Disclosure

- Companies must follow procedures prescribed under the SEC final rule to survey and disclose the use of conflict minerals.
- Surveys that trace back the supply chain are required to determine whether conflict minerals are used in our products

## Required Disclosure Information:

- Names of products containing conflict minerals that cannot be said to be Conflict Free
- The country of origin, refining facility (smelter name) and the mine if possible for conflict minerals contained in the products above.
- Details of due diligence performed (conflict minerals survey and efforts toward improving supply chain management, etc.)

## Required Reporting Steps for Disclosure:



\*1 Products containing even miniscule amounts of conflict minerals are subject to disclosure requirements.

\*2 Recycled conflict minerals or those from scrap are exempt from further surveys.

# 1-4. Efforts toward Improvement

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- The SEC final rule requires due diligence\*.
- Beyond conflict minerals survey and reporting, efforts toward improvement are required.

## Due Diligence

- Due diligence means identifying risks and implementing necessary measures to mitigate those risks to prevent or mitigate the negative effects created by corporate activities or conflict minerals procurement.
- OECD Due Diligence Guidance is recommended (as internationally recognized method) for reference.

## Due Diligence Examples:

- Identify and evaluate risks in the supply chain. Develop and execute risk management plans (carry out efforts toward improvement)
- The structure of corporate management framework for supply chain management (including the items below)
  - Application of corporate policies related to minerals supply chain
  - Investigation of actual (mining -> transport -> smelting -> product production) mineral supply chain (conflict minerals survey)
  - Strengthening relations with suppliers

## Precautions

- Nidec Group may conduct more detailed survey to resolve any remaining open issues.
- Nidec Group may ask you to take steps beyond survey toward improvement.
- Nidec Group may visit you and your suppliers to make inquiries to your related parties and access to related materials to the extent possible.



# 1-5. Nidec Group's Approach to Conflict Minerals

Nidec Group asks for the understanding of our suppliers for our Conflict Minerals Policy Statement. We also ask for our suppliers' cooperation with our surveys and other efforts to secure a Conflict Free supply.

## Nidec Group Conflict Minerals Policy Statement

“Conflict minerals” are mineral resources mined in conditions of armed conflict and human rights abuses, notably in the eastern provinces of the Democratic Republic of the Congo (“DRC”) and its surrounding countries. The profits from the extraction and trade of these conflict minerals, defined by the US State Department as gold, tin, tantalum, and tungsten, are believed to finance multiple armed groups and contribute to inhumane treatment, including human trafficking, slavery, forced labor, child labor, torture and war crimes in the conflict regions. Conflict minerals usually pass through a variety of intermediaries before reaching the final consumer.

The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to conflict minerals, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain conflict minerals that are necessary to the functionality or production” of those products.

We comply with these requirements to further the humanitarian goal of ending violent conflict and prohibit using in our products gold, tin, tungsten, or tantalum from any source whose supply chain contributes to human rights abuses in the DRC or its adjoining countries. We also expect our partners to support this policy throughout the supply chain to ensure that only conflict free materials and components are used in the parts and components we procure. If we discover the use of gold, tin, tantalum, and tungsten produced in facilities that are considered to be non-conflict free, in any material, parts or components we procure, we will take appropriate actions to make our products conflict free.

## 2. Outline of Survey and Reporting on Conflict Minerals

## 2-1.Survey Outline

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<b>Survey Objectives</b>	<ul style="list-style-type: none"><li>➤ Identify products containing conflict minerals (necessary to the functionality or production of the products).</li><li>➤ Identify smelters* who are supplying conflict minerals in products.</li></ul> <p>*Identify the smelters to identify whether or not minerals are conflict free.</p>
<b>Products Subject to Survey</b>	<p>The products subject to survey are the products produced by your company during the period between January 1 and December 31, 2014 for the delivery to Nidec Group.</p> <p>(The products expected to be delivered to Nidec Group with manufactured date January 1 and December 31, 2014)</p>
<b>Survey Period</b>	<p>September 1 –November 30, 2014 (Response deadline: Submit survey results by November 30)</p> <p>Follow-up to be performed as required (December, 2014 - )</p>
<b>Survey File</b>	<p>Use the “EICC-GeSI Conflict Minerals Reporting Template” commonly used for conflict minerals survey and reporting (as a questionnaire format)</p>

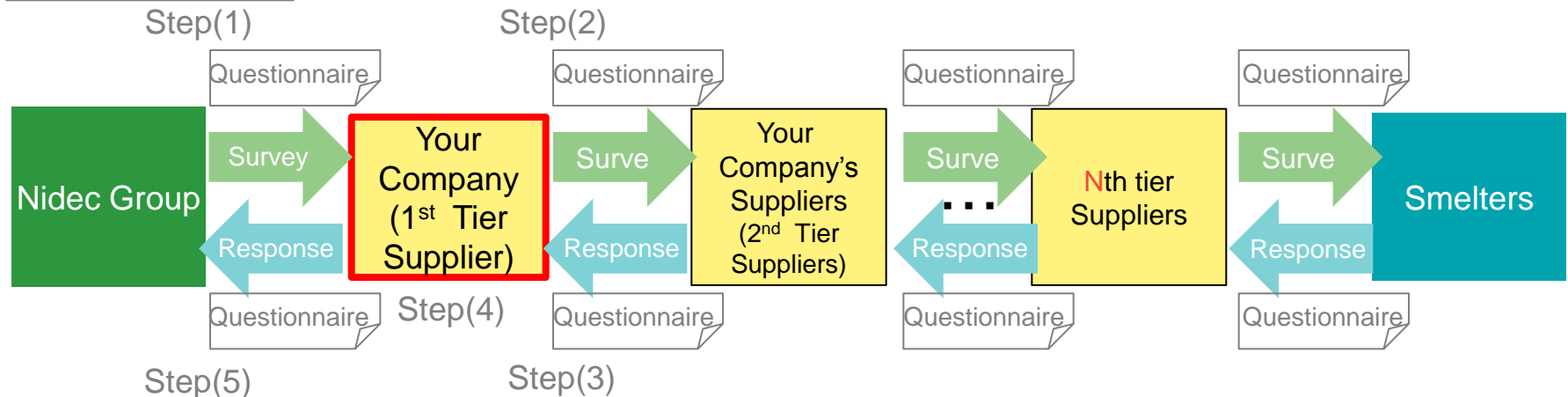
## 2-2. Basic Survey Flow

Your company should trace back the supply chain to identify smelters, by surveying suppliers with whom you conduct business directly (Conflict Minerals Reporting questions flow from Nidec Group to your company to your company's suppliers).

### Steps

- Step(1) : Receive Survey Request from Nidec Group
- Step(2) : Send Survey Request to Your Company's Suppliers
- Step(3) : Collect Responses from Your Company's Suppliers
- Step(4) : Summarize Collected Responses and Create Your Company's Response
- Step(5) : Send Response to Nidec Group

### Flow



# 2-3.Survey File : EICC/GeSI template

- Endorsed by leading trade and industry associations\*, many companies use the “EICC-GeSI Conflict Minerals Reporting Template” (hereinafter “EICC-GeSI Template”) as a standard questionnaire. It contains the major reporting items required for disclosure.
- Please complete the EICC-GeSI Template leaving no blank responses for the purpose of appropriate disclosure

**Conflict Minerals Reporting Template (CMRT)**

Company Information

Declaration Scope or Class

1) Is the conflict mineral intentionally added to your product? (\*)

2) Is the conflict mineral necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (\*)

3) Does any of the conflict mineral originate from the covered countries? (\*)

EICC/GeSI template contains the major reporting items required for disclosure



**Please complete the EICC-GeSI Template leaving no blank responses**

## Required Survey Steps :

(1) Step 1 Investigate Conflict Mineral Inclusion

(2) Step 2 Conduct Country of Origin Survey

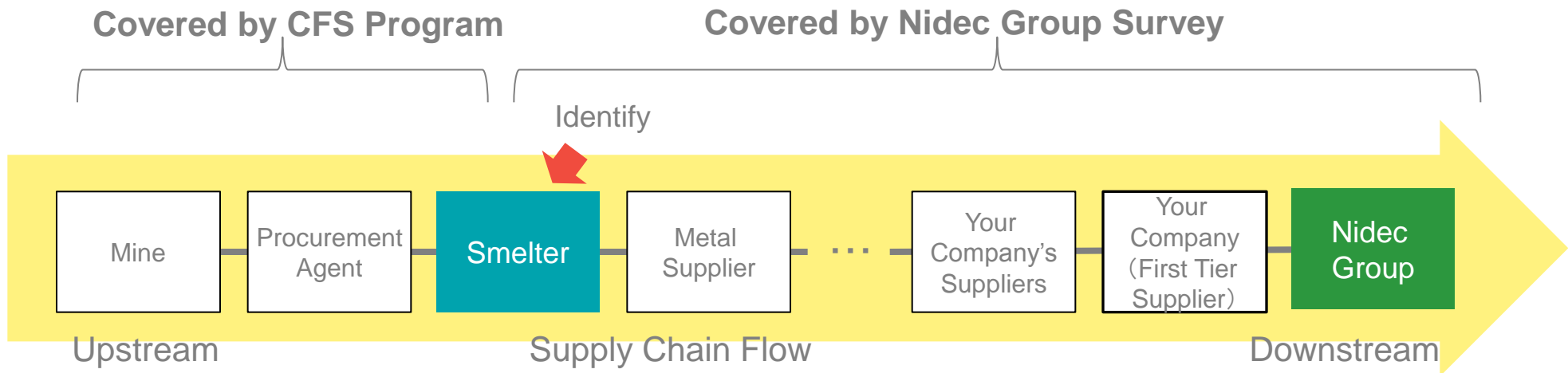
(3) Step 3 Conduct Conflict Free Survey

(4) Resolve Open Issues & Make Improvements

\* Japan Automobile Manufacturers Association, Inc. (JAMA), Japan Electronics and Information Technology Industries Association (JEITA), etc.

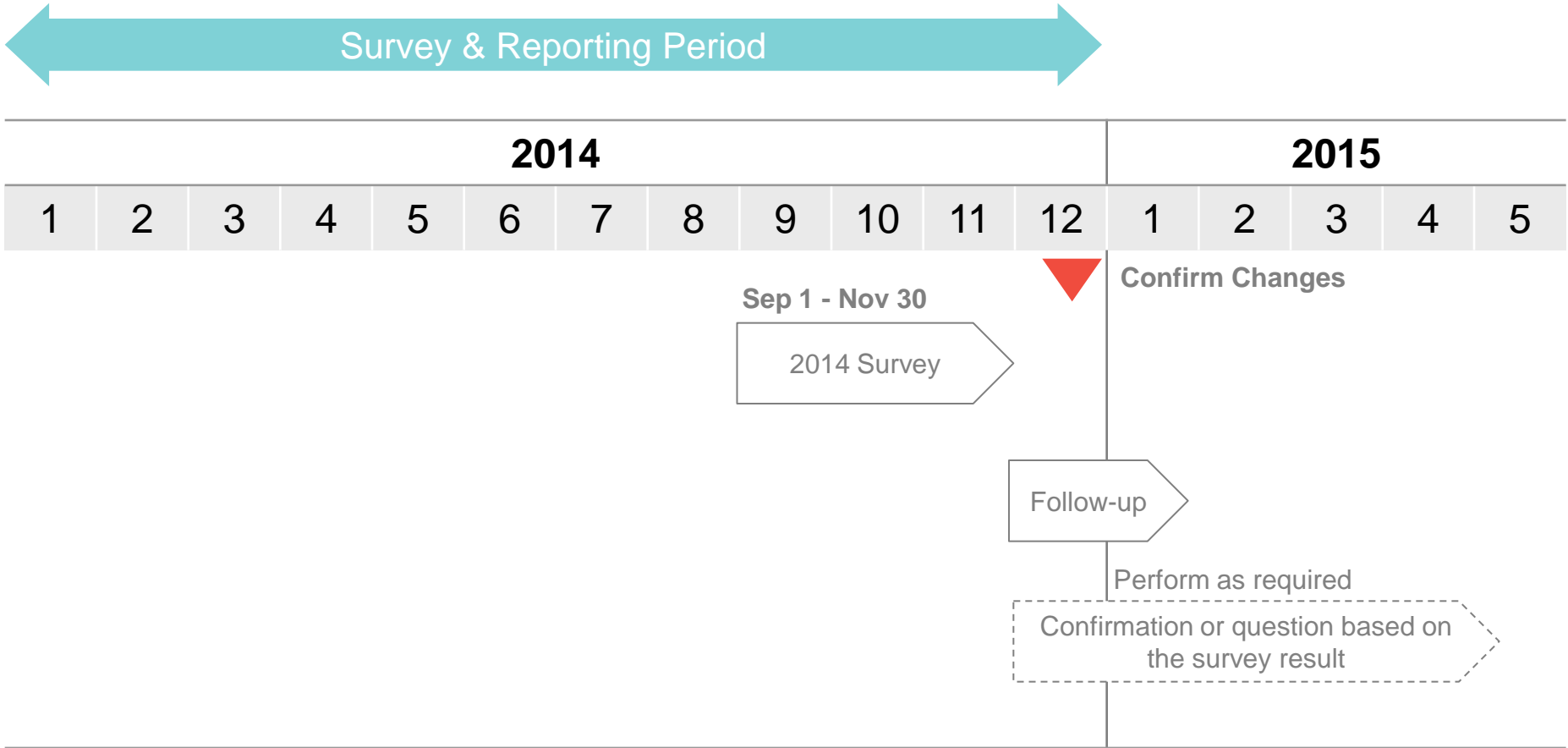
## 2-4. Identify Smelters Who Supplies Conflict Minerals

- To confirm whether or not conflict minerals are conflict free, companies must identify the mine from which they originate. However, companies face difficulties identifying these mines on their own.
- To this end EICC and GeSI introduced the “Conflict Free Smelter (CFS) Program” to confirm whether smelters are Conflict Free (not funding armed groups).
- Nidec Group survey traces back the supply chain to identify the smelter, and if the smelter is on CFS Program Compliant Smelter List\*, then those minerals are considered Conflict Free.



\*Compliant Smelter List in CFS Program: <http://www.conflictreesmelter.org/cfshome.htm>

# 2-5. 2014 Survey and Reporting Schedule



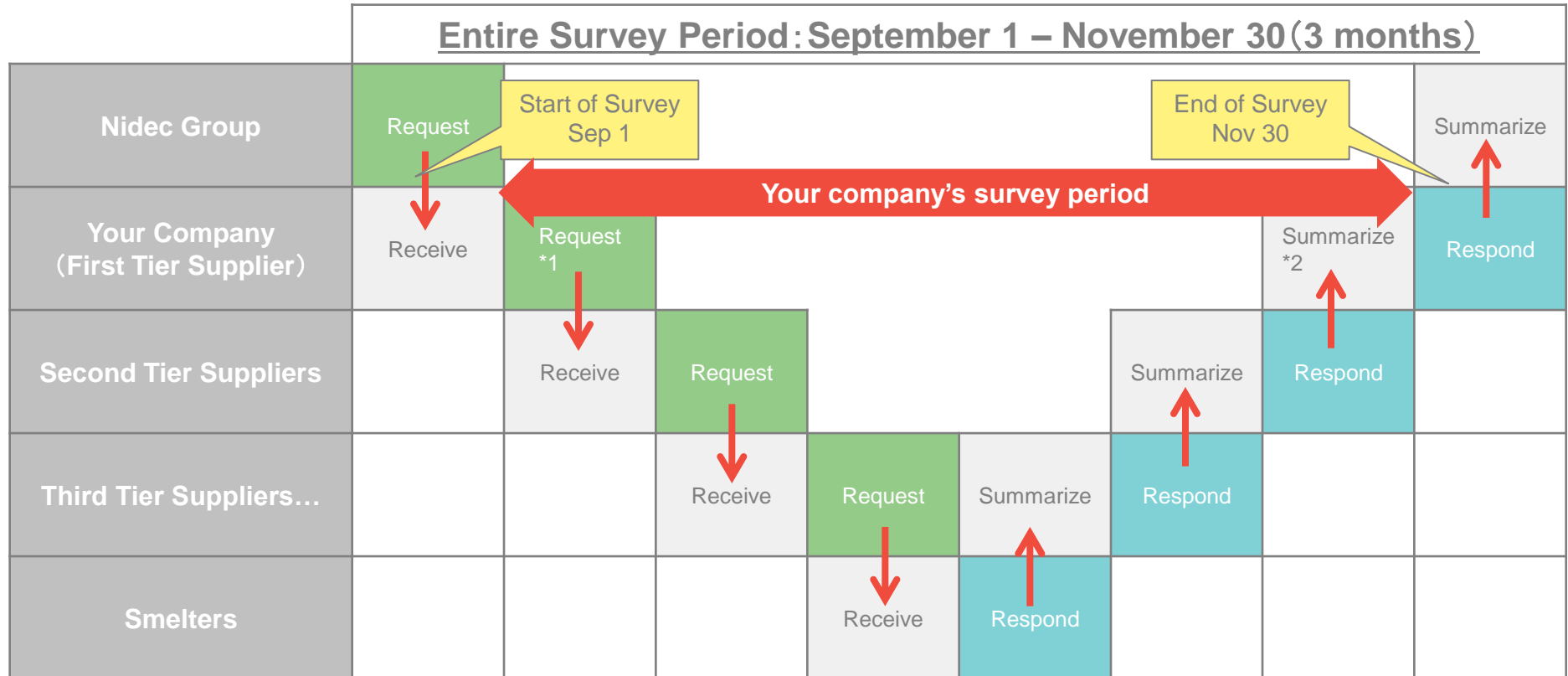
**Precautions**

- We may occasionally confirm your progress during Nidec Group Survey.
- We may make inquiries to your suppliers.



## 2-6. Examples for Setting Your Company's Response Deadline

When requesting surveys to your company's suppliers, please provide a sufficient survey period and set a reasonable response deadline that allows for upstream supplier surveys.



### Precautions

\*1: Please consider time required for selecting second tier suppliers subject to the survey and preparing for request

\*2: Please consider time required for validating and summarizing answers collected, and preparing for submission



# 3. Instructions for Survey and Reporting

**Step(1) : Receive Survey Request from Nidec Group**

Step(2) : Send Survey Request to Your Company's Suppliers

Step(3) : Collect Responses from Your Company's Suppliers

Step(4) : Summarize Collected Responses and Create Your Company's Response

Step(5) : Send Response to Nidec Group

# 3-1. Step(1) : Receive Survey Request from Nidec Group

- You can complete this survey either in English or Japanese.
- Please download EICC-GeSI Conflict Minerals Reporting Template (Version 3.01/Excel 2003 format file provided by JAMA\*1, Japanese or English version) from JAMA website mentioned below \*2

\*1 JAMA: Japan Automobile Manufacturers Association, Inc.

\*2 Unnecessary to download "Report Form Completion Guideline for Conflict Minerals Reporting Template"

JAMA's Conflict Minerals Supply Chain Survey Website  
(Japanese Version)

[http://www.jama.or.jp/c\\_minerals/index.html](http://www.jama.or.jp/c_minerals/index.html)

2014年 紛争鉱物 (コンフリクト・ミネラル) 調査 調査資料

[中文版資料 \(Chinese ver.\)](#) | [英語版資料 \(English ver.\)](#)

このページでは、2014年における紛争鉱物調査の資料やツールを無料公開しています。  
ご注意事項をお読みの上、調査のご協力をお願いします。

- You can get those documents in English.  
Please select the button "English ver." on the top of the page.
- 已经准备了中文版资料。  
请点击本页面上方的"中文版資料 (Chinese ver.)"。

EICC/GeSI template  
Japanese version

No.	資料/ツール名	頁数	説明	ダウンロード	形式	最終更新日
1	EICC/GeSI 帳票 (Rev 3.01)		2014年の調査に使用する調査票です。	▼DOWNLOAD	📄	2014/6/16
2	調査実施 マニュアル (サマリー版)	2頁 (A3)	調査を開始される際に、まずこちらの資料をご目下下さい。調査実施時の注意事項と、各社へお願いする作業手順の概要を記載しています。	▼DOWNLOAD	📄	2014/6/16
3	調査実施 マニュアル (詳細版)	32頁 (A4)	No.2「調査実施マニュアル」を補足する資料です。調査の作業手順とEICC/GeSI帳票(Rev 3.00)の解説を記載しています。	▼DOWNLOAD	📄	2014/6/16
4	調査回答の手引き	12頁 (A4)	調査の背景、依頼事項、使用する帳票の解説を記載しています。	▼DOWNLOAD	📄	2014/6/16

JAMA's Conflict Minerals Supply Chain Survey Website  
(English Version)

[http://www.jama.or.jp/c\\_minerals/index\\_e.html](http://www.jama.or.jp/c_minerals/index_e.html)

FY2014 Conflict Mineral Survey Documents

[中文版資料 \(Chi](#)

EICC/GeSI template  
English version

Each instruction document below is available free of charge. Please utilize these documents.  
We appreciate your cooperation.

No.	Document / tool	No. of pages	Description	Download	File	Last up date
1	EICC/GeSI Template (Rev 3.01)		FY2014 survey form	▼DOWNLOAD	📄	June 16, 2014
2	Survey manual (Summary version)	2p (A3)	You can understand the survey procedures and survey form easily at a glance.	▼DOWNLOAD	📄	June 19, 2014
3	Survey manual (full version)	32p (A4)	Supplemental document for above Manual #2. Please use it if you need.	▼DOWNLOAD	📄	June 19, 2014
4	Report Form Completion Guideline	12p (A4)	Key points of survey procedures and how to fill in answers.	▼DOWNLOAD	📄	June 19, 2014
5	Add-up tool (2014 version)		Tool to check suppliers' answers, and to create your own answer from your	▼DOWNLOAD	📄	June 16, 2014

## 3-2. Step(1) : Questionnaire Format (EICC-GeSI Template)

- Nidec Group surveys whether conflict minerals are used for each product.
- Please create one Excel file of EICC-GeSI Template each for the products which have exactly the same result\*1.
- Please use the “Declaration”, “Smelter List”, “Checker” and “Product List” \*2 Spreadsheet for this survey .

\*1 "exactly the same result": all information inputted in the Declaration Sheet –Part 2(Rows 24–65)and the Smelter List information is 100% the same

### EICC-GeSI Template (Excel file)

The screenshot shows an Excel spreadsheet titled "Conflict Minerals Reporting Template (CMRT)". It features the CFSI logo and instructions in multiple languages: English, Chinese, Korean, Japanese, French, Spanish, and Italian. The instructions state: "The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products". Below this, it says: "Mandatory fields are noted with an asterisk (\*). The information collected in this template should be updated annually. Any changes within the annual cycle should be provided to your customers". At the bottom, there are tabs for "Revision", "Instructions", "Definitions", "Declaration", "Smelter List", "Standard Smelter Names", "Checker", and "Product List". The "Declaration", "Smelter List", "Checker", and "Product List" tabs are highlighted with red boxes and arrows pointing to explanatory text boxes below.

#### ■ Declaration

Please complete questions on company information, the use of conflict minerals, compliance/governance, etc.

#### ■ Smelter List

Please answer questions related to conflict mineral smelters.

#### ■ Checker

If responses are incomplete (blank), cells remain red.

#### ■ Product List

Please list all the products subject to the EICC-GeSI template (Please fill in the Product List in either case; there is only one product or there are multiple products)

# 3. Instructions for Survey and Reporting

Step(1) : Receive Survey Request from Nidec Group

**Step(2) : Send Survey Request to Your Company's Suppliers**

Step(3) : Collect Responses from Your Company's Suppliers

Step(4) : Summarize Collected Responses and Create Your Company's Response

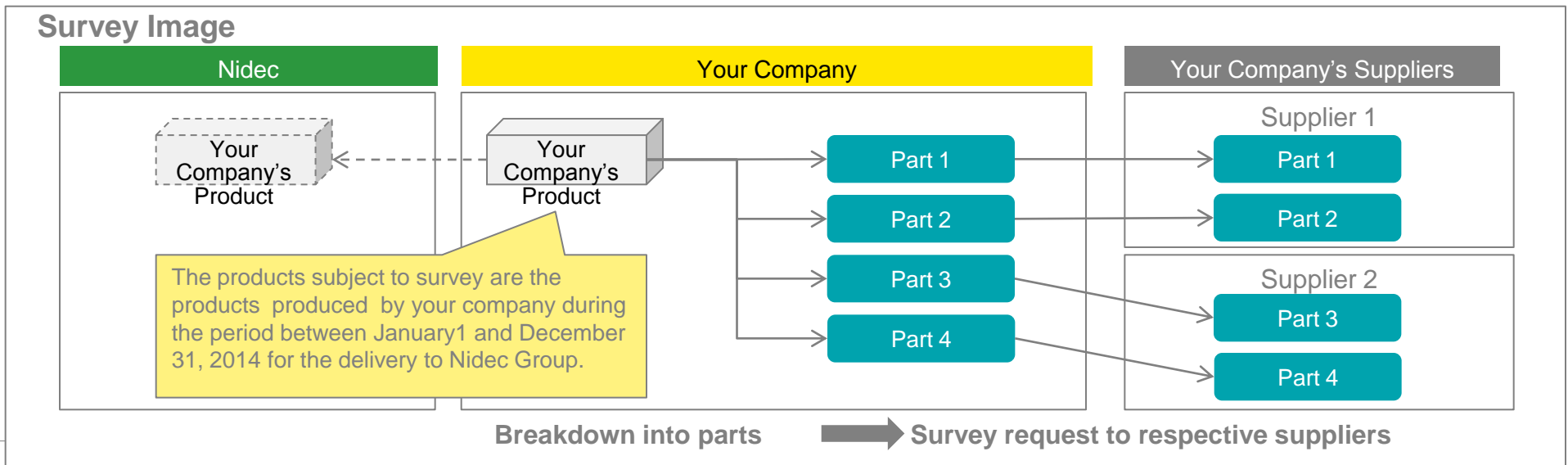
Step(5) : Send Response to Nidec Group

## 3-3. Step(2) : Send Survey Request to Your Company's Suppliers

- As your company needs to trace back the supply chain in a limited period, please promptly ask your company's suppliers to conduct surveys.
- If products fit either of these descriptions, please skip ahead to Step (4):
  - Products for which your company can identify conflict mineral smelters
  - Products for which your company can clearly determine the absence of conflict minerals

### ■ Survey Points

- (1) Please conduct a survey that allows your company to fill in an EICC-GeSI Template for each product (i.e. Identify parts in your product and survey suppliers of each part)
- (2) Nidec Group recommends using the EICC-GeSI Template to survey your company's suppliers as well.
- (3) If your company's suppliers use the EICC-GeSI Template, please ask your suppliers to use the "Checker" sheet before submission, and submit it with no incomplete (blank) responses.



# 3. Instructions for Survey and Reporting

Step(1) : Receive Survey Request from Nidec Group

Step(2) : Send Survey Request to Your Company's Suppliers

**Step(3) : Collect Responses from Your Company's Suppliers**

Step(4) : Summarize Collected Responses and Create Your Company's Response

Step(5) : Send Response to Nidec Group

## 3-4. Step(3) : Collect Responses from Your Company's Suppliers

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- If survey results from your company's suppliers contain incomplete (blank) responses, please request that your suppliers **correct incomplete responses, and obtain completed survey results.**
- Please conduct progress checks to your company's suppliers to ensure survey completion by the response deadline set by your company.

# 3. Instructions for Survey and Reporting

Step(1) : Receive Survey Request from Nidec Group

Step(2) : Send Survey Request to Your Company's Suppliers

Step(3) : Collect Responses from Your Company's Suppliers

**Step(4) : Summarize Collected Responses and Create Your Company's Response**

Step(5) : Send Response to Nidec Group



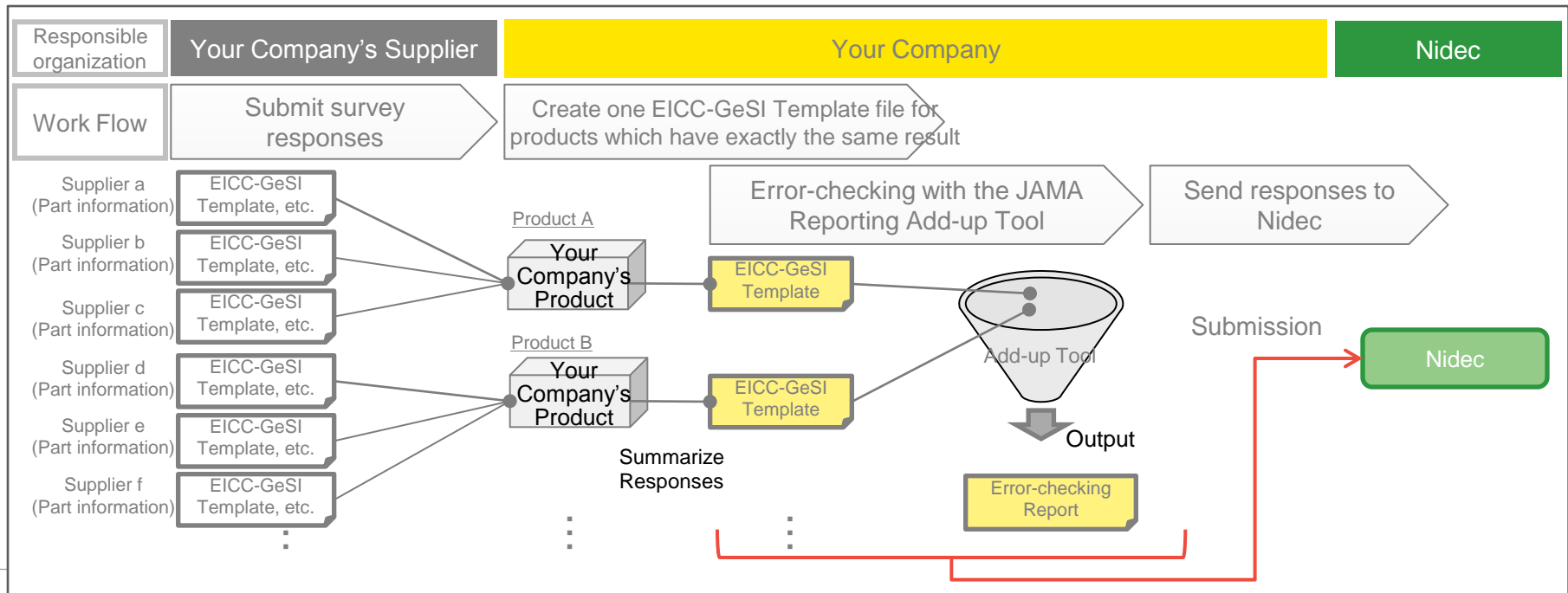
# 3-5. Step(4) : Summarize Collected Responses and Create Your Company's Response

- Please summarize responses from your company's suppliers and draft your company's response.
- Please create one Excel file of EICC-GeSI Template each for products which have exactly the same result\*1 as your company's response.
- After drafting your response, please use the "Reporting Add-up Tool" provided by the Japan Automobile Manufacturers Association (JAMA) to error-check your responses\*2.

\*1 "exactly the same result": all information inputted in the Declaration Sheet–Part 2(Rows 24–65) and the Smelter List information is 100% the same

\* 2 For tool use instructions, please see P48 "3-27. Step (4) : Use the JAMA Conflict Minerals Reporting Add-up Tool for Error & Warning - Checking".

## Flow of EICC-GeSI Template Collection, Add-up and Submission



# 3-6. Step (4) : Entry in EICC-GeSI Template

## - “Declaration” Sheet Structure -

“Declaration” sheet

The image shows a screenshot of the Conflict Minerals Reporting Template (CMRT) form. The form is divided into several sections:

- Company Information:** This section includes fields for Company Name, Description of Scope, Company Designation, Company Website, Company Address, Email - Contact, Phone - Contact, Title - Authorizer, Email - Authorizer, Phone - Authorizer, and Effective Date.
- Answer the following questions 1 - 7 based on the declaration scope indicated above:** This section contains seven questions (1-7) regarding conflict minerals, each with a table for Answer, Yes/No, Gold/Silver, and Comments.
- Answer the Following Questions at a Company Level:** This section contains ten questions (A-J) regarding conflict minerals, each with a table for Answer, Yes/No, Gold/Silver, and Comments.

### ■ EICC-GeSI Template: “Declaration” sheet structure

Part 1 (Rows 7–22)  
Please enter Company Information here. → Please see Page 27

Part 2 (Rows 24–65)  
Please complete six questions on the use of conflict minerals. → Please see Page 29-35

Part 3 (Rows 67-87)  
Please complete A-J questions on due diligence activities. → Please see Page 36-40

# 3-7. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 1 (Rows 7-22)-

"Declaration" sheet: Part 1 (Rows 7-22)

<b>Company Name (*):</b>	<b>1</b>
<b>Declaration Scope or Class (*):</b>	<b>2</b>
<b>Description of Scope:</b>	<b>3</b>
<b>Company Unique ID:</b>	<b>4</b>
<b>Company Unique ID Authority:</b>	
<b>Address:</b>	<b>5</b>
<b>Contact Name (*):</b>	<b>6</b>
<b>Email - Contact (*):</b>	
<b>Phone - Contact (*):</b>	
<b>Authorizer (*):</b>	<b>7</b>
<b>Title - Authorizer:</b>	
<b>Email - Authorizer (*):</b>	
<b>Phone - Authorizer (*):</b>	
<b>Effective Date (*):</b>	<b>8</b>

1. Please enter your company's Legal Name. Please do not use abbreviations.

2. Please select **"B. Product (or List of Products)"**. It is required to list all the products subject to the EICC/GeSI template in the **Product List**

3. Please enter the company code for Nidec Group company which your company is dealing with. (Nidec is going to inform you the company code to be entered here separately)

4. Please enter your company's company code. (Nidec is going to inform you the company code to be entered here separately)

5. Please enter your full company address (head office).

6. Please enter the name, email address and direct telephone number of the person to contact regarding the contents of the declaration information.

7. Please enter the name, title, email address and direct telephone number of the authorized management representative responsible for the accuracy of responses to the questions in this Declaration.

8. Please enter the Date of Completion for this form using the format DD-MMM-YYYY.

# 3-8. Step (4) : How to organize your responses in the EICC-GeSI Template

- Please create one Excel file of EICC-GeSI Template each for the products which have exactly the same result\*.
- Please make sure that all the products which have exactly the same result listed in the “Product List” sheet without any omission. (In either case; there is only one product or there are multiple products)

\* “exactly the same result”

“exactly the same result” means that all information inputted in the Declaration Sheet–Part 2(Rows 24–65) and the Smelter List information is 100% the same

**Declaration**

Q1 -----  
 Q2 -----  
 Q3 -----  
 Q4 -----  
 Q5 -----  
 Q6 -----  
 Q7 -----

**Smelter List**

Metal	Smelter ref	Std smelter	.....
**	*****	*****	
**	*****	*****	

List all the products subject to the template, and then complete the EICC-GeSI template

**Product List**

Manufacturer's Product Number	Manufacturer's Product Name	Comments
aaa	****	
bbb	****	
ccc	****	
ddd	****	
eee	****	

The product number should be the numbers which are utilized in the transaction between your company and Nidec.

please provide product name.

**Conflict Minerals Reporting Template**

Select Language Preference Here:  
 请选择报告的语言:  
 사문용 언어를 선택하십시오:  
 表示言語をここから選択してください:  
 Sélectionner la langue préférée ici:  
 Seleccione Preferencia de idioma Aquí:  
 Wählen sie hier die Sprache:  
 Selezionare el lenguaje de preferencia aquí:  
 Selezionare la lingua di preferenza qui:

English

Revision 3.01  
 May 30, 2014

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Link to Terms & Conditions

Revision / Instructions / Definitions / Declaration / Smelter List / Standard Smelter Names / Checkers / Product List



# 3-9. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (1)-

### Precautions for Questions in Part 2 (Rows 24–65)

- Please summarize all responses from your company's suppliers into one response **for each product**. (If reporting the "products which have exactly the same result" in one template, please see page 28)
- Please summarize **collected responses before the response deadline** set by Nidec Group.
- Questions (3)–(7): Explanation page for each question (pages 31 – 35) describes how to enter your company's response by summarizing responses from your company's suppliers. Please refer to this when drafting your company's responses.

### Part 2 (Rows 24–65) Question (1)

1) Is the conflict metal intentionally added to your product? (*)	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Possible responses:  
➤ Yes  
➤ No

- If even one of your company's suppliers responded "Yes," your company's response is "Yes." (Smelter list entry required for all metals for which your company's response is "Yes.")
- If your company's response is "No," Nidec Group may contact your company at a later date for the reasoning for that determination.

# 3-9. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (2)-

### Part 2 (Rows 24–65) Question (2)

2) Is the conflict metal necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)		Answer
	Tantalum (*)	
	Tin (*)	
	Gold (*)	
	Tungsten (*)	

Possible responses:  
➤ Yes  
➤ No

- If even one of your company's suppliers responded "Yes," your company's response is "Yes." (Smelter list entry required for all metals for which your company's response is "Yes.")
- If your company's response is "No," Nidec Group may contact your company at a later date for the reasoning for that determination.

# 3-10. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (3)-

### Part 2 (Rows 24–65) Question (3)

3) Does any of the conflict metal originate from the covered countries? (*)		Answer
	Tantalum (*)	
	Tin (*)	
	Gold (*)	
	Tungsten (*)	

Possible responses:

- Yes
- No
- Unknown

- Your company may only respond “No” if all of your company’s suppliers responded “No.”
- If even one supplier responded “Yes,” please enter “Yes.”
- For other cases, please refer to the examples of response patterns in the table below

		If All Suppliers Responded No	If Even One Supplier Responded Yes	If Responses include No and Unknown
Examples of Your Company’s Suppliers’ Response Pattern	Supplier 1	No	Yes	No
	Supplier 2	No	No	No
	Supplier 3	No	Unknown	Unknown
Your Company’s Response		No	Yes	Unknown

# 3-11. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (4)-

### Part 2 (Rows 24–65) Question (4)

<b>4) Does 100 percent of the conflict metal (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)</b>		<b>Answer</b>
	<b>Tantalum (*)</b>	
	<b>Tin (*)</b>	
	<b>Gold (*)</b>	
	<b>Tungsten (*)</b>	

Possible responses:

- Yes
- No
- Unknown

- Your company may only respond “Yes,” if all of your company’s suppliers responded “Yes.”
- If even one supplier responded “No,” please enter “No.”
- For other cases, please refer to the examples of response patterns in the table below.

		If All Suppliers Responded	If Even One Supplier Responded	If Responses include Yes and Unknown
		Yes	Yes No	
Examples of Your Company's Suppliers' Response Pattern	Supplier 1	Yes	Yes	Yes
	Supplier 2	Yes	No	Yes
	Supplier 3	Yes	Unknown	Unknown
Your Company's Response		Yes	No	Unknown



# 3-12. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (5)-

### Part 2 (Rows 24–65) Question (5)

5) Have you received conflict metals data/information for each metal from all relevant suppliers of 3TG? (\*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

#### Possible responses:

- Yes, 100%
- No, but greater than 75%
- No, but greater than 50%
- No, but greater than 25%
- No, but less than 25%
- None

- Respond "Yes" only if your company has collected 100% of supplier responses.
- If other than "Yes," please enter percentage of collected responses. For responses containing blank cells or other deficiencies, do not count response as collected until all deficiencies are resolved. Also, please enter the reason a response could not be collected in the "Comments" section.

(Examples of "Comments" Section Entries)

No Reply: ##%

Incomplete Reply(Correction Requested) : ##%

Refused to Respond due to Confidentiality Concerns : ##%

# 3-13. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (6)-

### Part 2 (Rows 24–65) Question (6)

6) For each conflict metal, have you identified all of the smelters your company and its suppliers use to supply the products included within the declaration scope indicated above? (\*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Possible responses:

- Yes
- No

- Your company may only respond “Yes,” if all of your company’s suppliers responded “Yes.”
- If even one supplier responded “No,” please enter “No.”

# 3-14. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 2 (Rows 24–65) Question (7)-

### Part 2 (Rows 24–65) Question (7)

<b>7) Has all applicable smelter information received by your company been reported in this declaration? (*)</b>		<b>Answer</b>
	<b>Tantalum (*)</b>	
	<b>Tin (*)</b>	
	<b>Gold (*)</b>	
	<b>Tungsten (*)</b>	

Possible responses:  
 ➤ Yes  
 ➤ No  
 ➤ Unknown

- Your company may only respond “Yes,” if all of your company’s suppliers responded “Yes.”
- If even one supplier responded “No,” please enter “No.”
- For other cases, please refer to the examples of response patterns in the table below.

		If All Suppliers Responded Yes	If Even One Supplier Responded No	If Responses include Yes and Unknown
Examples of Your Company's Suppliers' Response Pattern	Supplier 1	Yes	Yes	Yes
	Supplier 2	Yes	No	Yes
	Supplier 3	Yes	Unknown	Unknown
Your Company's Response		Yes	No	Unknown

\*For more about Conflict Free Smelter (CFS) Program, please see Page 14.

# 3-15. Step (4) : Entry in EICC-GeSI Template

## - "Declaration" Sheet: Part 3 (Rows 67-87) Questions A and B -

### Precautions for Questions in Part 3 (Rows 67-87)

- Please describe the state of your company's efforts.  
(No need to summarize responses from your company's suppliers)

### Part 3 (Rows 67-87) Questions A and B

Question	Answer
A. Do you have a policy in place that addresses conflict minerals sourcing? (*)	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	

#### Possible responses to Question A:

- Yes
- No

#### Note

- If "Yes," please enter summary of policy in the "Comments" section.

#### Possible responses to Question B:

- Yes
- No

#### Note

- If "Yes," please provide web link in the "Comments" section, or attach materials.

# 3-16. Step (4) : Entry in EICC-GeSI Template

## - "Declaration" Sheet: Part 3 (Rows 67-87) Questions C and D -

---

### Part 3 (Rows 67-87) Questions C and D

C. Do you require your direct suppliers to be DRC conflict-free? (\*)

D. Do you require your direct suppliers to source from smelters validated by an independent private sector audit firm? (\*)

#### Possible responses to Question C:

- Yes
- No

#### Notes

- If "Yes," please enter requirements in the Comments section, or attach materials.

#### Possible responses to Question D:

- Yes
- No

#### Notes

- If "Yes," please enter requirements in the Comments section, or attach materials.

# 3-17. Step (4) : Entry in EICC-GeSI Template

## -"Declaration" Sheet: Part 3 (Rows 67-87) Questions E and F -

### Part 3 (Rows 67-87) Questions E and F

E. Have you implemented due diligence measures for conflict-free sourcing? (\*)

F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (\*)

#### Possible responses to Question E

- Yes
- No

#### Note

- If "Yes," please enter the measures implemented in the "Comments" section, or attach materials.

#### Reference: Examples of Due Diligence

- Communicating your company's conflict minerals policy to your company's suppliers
- Reviewing contracts to reflect above policy
- Conducting risk assessment for each of your company's suppliers and crafting response
- Verification of compliance with conflict minerals policies by each of your company's suppliers

#### Possible responses to Question F:

- Yes
- No

# 3-18. Step (4) : Entry in EICC-GeSI Template

## - "Declaration" Sheet: Part 3 (Rows 67-87) Questions G and H -

---

### Part 3 (Rows 67-87) Questions G and H

G. Do you request smelter names from your suppliers? (\*)

H. Do you review due diligence information received from your suppliers against your company's expectations? (\*)

#### Possible responses to Question G:

- Yes
- No

#### Possible responses to Question H:

- Yes
- No

#### Notes

- This questions concerns how your company verifies the correctness of responses provided by your company's suppliers.
- If "Yes," enter summary of verification procedures in the "Comments" section, or attach materials.

# 3-19. Step (4) : Entry in EICC-GeSI Template

## - "Declaration" Sheet: Part 3 (Rows 67-87) Questions I and J -

---

### Part 3 (Rows 67-87) Questions I and J

I. Does your review process include corrective action management? (\*)

J. Are you subject to the SEC Conflict Minerals rule? (\*)

#### Possible responses to Question I:

- Yes
- No

#### Notes

- If your company is implementing corrective actions to address deficiencies identified in Question H results, please select "Yes."
- If "Yes," please enter summary of corrective action process in the "Comments" section, or attach materials.

#### Possible responses to Question J:

- Yes
- No

#### Note

- If your company or parent company is an US listed company, please select "Yes."



# 3-20. Step (4) : Entry in EICC-GeSI Template

## -"Smelter List" Sheet Left Side (1)-

### Precautions when creating Smelter List

- Please create the Smelter List by summarizing the responses from your company's suppliers **for each product**. (If reporting the "products which have exactly the same result" in one template, please see page 28)
- Please enter one smelter for each line.
- If responses from your company's suppliers contain the same smelter, please combine them.

### "Smelter List" sheet left side (1)

**To begin:**


Step 1. Select Metal in column B

Step 2. Select from dropdown in column C

Step 3. If dropdown selection is "Smelter Not Listed" complete columns D & E

Step 4. Enter all available smelter information in columns H thru P

Mandatory fields are noted with an asterisk (\*).



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Metal (*)	Smelter Reference List (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification Number	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
1	2	3	4	5	6	7	8	9

#### (1) Metal

- Select metal used in the product.
- For metals for which "Yes" was selected in Part 2 (Rows 24–65) Question (1) of the "Declaration" sheet, please enter at least one smelter.

#### (2) Smelter Reference List


- Please select the smelter from pull down list.
- Selecting smelter automatically populates items (3)-(6).
- If the smelter does not appear in pull down list, please select the very last available option, "Smelter Not Listed."
- If smelter is unknown, please select very first available option, "Smelter not yet identified" (entry not required beyond (3)).

# 3-21. Step (4) : Entry in EICC-GeSI Template

## -"Smelter List" Sheet Left Side (2)-

"Smelter List" sheet left side (2)

**To begin:**  
**Step 1. Select Metal in column B**  
**Step 2. Select from dropdown in column C**  
**Step 3. If dropdown selection is "Smelter Not Listed" complete columns D & E**  
**Step 4. Enter all available smelter information in columns H thru P**  
 Mandatory fields are noted with an asterisk (\*).

  
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Metal (*)	Smelter Reference List (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
1	2	3	4	5	6	7	8	9

(3) Smelter Name

(4) Smelter Country

(5) Smelter Identification

(6) Source of Smelter Identification Number

- Entered automatically if smelter is selected in (2).
- If "Smelter Not Listed" is selected in (2), please enter (3) and (4).
- If Smelter cannot be disclosed, please select "Smelter Not Listed" in (2), and enter "Undisclosed" in (3).

(7) Smelter Street

(8) Smelter City

(9) Smelter Facility Location: State/Province

- To the extent possible, please enter smelter's address (especially if "Smelter Not Listed" is selected in (2)).

# 3-22. Step (4) : Entry in EICC-GeSI Template

## - "Smelter List" Sheet Right Side (1)-

"Smelter List" sheet right side (1)

[Link to "CFSP Compliant Smelter List"](#)

Revision 3.01 May 30, 2014

Smelter Contact Name	Smelter Contact Email	Proposed next steps	Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap sources?	Comments
10	11	12	13	14	15	16

### (10) Smelter Contact Name

### (11) Smelter Contact Email

- To the extent possible, please enter contact person's name and email address as smelter's contact information (especially if "Smelter Not Listed" is selected in (2)).

### (12) Proposed next steps

- Please enter your company's approach to smelters who have yet to adopt the CFS Program.

### (Entry Examples)

- Request suppliers to accept CFS Program.
- Request suppliers to disclose country of origin for raw materials.

# 3-23. Step (4) : Entry in EICC-GeSI Template

## - "Smelter List" Sheet Right Side (2) -

"Smelter List" sheet right side (2)

[Link to "CFSP Compliant Smelter List"](#)

Revision 3.01 May 30, 2014

Smelter Contact Name	Smelter Contact Email	Proposed next steps	Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap sources?	Comments
10	11	12	13	14	15	16

(13) Name of Mine(s) or ...

(14) Location (Country) of Mine(s) or ...

- To the extent possible, please enter the name or location (country) of mine from which the metal was extracted.
- If recycled or scrap sourced, please enter "recycled" or "scrap."

(15) Does 100% of ...

- Please answer "Yes" if the smelter solely obtains inputs for its smelting process(es) from recycled or scrap sources. Answer "No" otherwise.

(16) Comments

- Please enter supplementary items if any.

# 3-24. Step (4) : Entry in EICC-GeSI Template

## - "Product List" Sheet -

### "Product List" Sheet

Please make sure that all the products, which have exactly the same answers to all the questions in the "Declaration –Part 2(Rows 24–65)" and the "Smelter List" sheets, listed in the "Product List" sheet without any omission. (Please fill in the Product List in either case; there is only one product or there are multiple products)

**(1) Manufacturer's Product Number**

- Please list all the product numbers for the products subject to the template. The product number should be the numbers which are utilized in the transaction between your company and Nidec.

->In the case you have Nidec-specified numbers: Please use those numbers  
 ->Otherwise: Please use your company's product numbers

**(2) Manufacturer's Product Name**

- Please provide product name

**(3) Comments**

- Please enter supplementary items if any.

## 3-25. Step (4) : Change of EICC-GeSI Template File Name

Please name the EICC-GeSI Template file in accordance with the instruction below.

Default file name right after downloaded from JAMA Website;

➤CFSI\_CMRT3-01\_E.xls



<Precaution> Please use underscores ( \_ ) between the words , not spaces

**2014\_\*\*\*\*\*\_xx.xls**

Survey year (“2014”)

Sequential number (01-99: to be set up by your company)

Your company’s company code. (Nidec is going to inform you the company code to be entered here separately)

## 3-26. Step (4) : Perform Response Check

---

### Post Response Checklist

- ✓ Please confirm that your company is using the Nidec Group-specified EICC-GeSI Template (Version 3.01).
- ✓ Please confirm that “B. Product (or List of Products)” is selected for “Declaration Scope or Class” on “Declaration” sheet in EICC-GeSI Template (see Page 27).
- ✓ Please confirm that Company code sent by Nidec Group is entered in “Company Unique ID” on “Declaration” sheet of EICC-GeSI Template (see Page 27)
- ✓ Please confirm that the smelter information revealed through this survey is entered (except for metals for which the response to Question (1) and (2) are “No”) on “Smelter List” sheet of EICC-GeSI Template.
- ✓ Please confirm the “Checker” sheet that there are deficiencies (blank) answers (if there are deficiencies (blank) in the “Declaration” sheet, deficient fields are highlighted in red on the “Checker” sheet).
- ✓ Please confirm that Excel file name of EICC-GeSI Template is entered according specification ( see Page 46).

# 3-27. Step (4) : Use the JAMA Conflict Minerals Reporting Add-up Tool for Error & Warning - Checking

- After performing response checking on the previous page (Page 47), please perform error & warning - checking on your company's responses (all EICC-GeSI Templates) using the Conflict Minerals Reporting Add-up Tool provided by the Japan Automobile Manufacturers Association (JAMA).
- Please download the Conflict Minerals Reporting Add-up Tool via the JAMA Conflict Minerals Reporting Website (see table below).\*1

\*1 Nidec will provide your company with the password required for the download.

## JAMA Conflict Minerals Reporting Website

[http://www.jama.or.jp/c\\_minerals/index\\_e.html](http://www.jama.or.jp/c_minerals/index_e.html)

### FY2014 Conflict Mineral Survey Documents

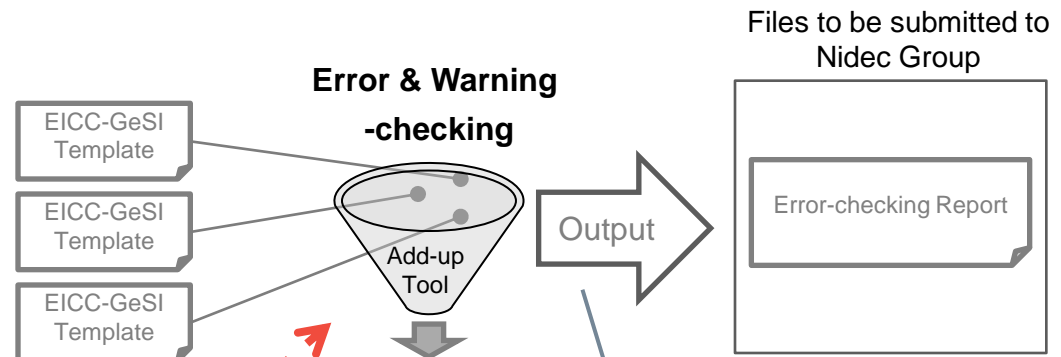
[中文版資料 \(Chinese ver.\)](#) | [日本語版資料 \(Japanese ver.\)](#)

Each instruction document below is available free of charge. Please utilize these instructions. We appreciate your cooperation.

No.	Document / tool	No. of pages	Description	Download	File	Last up date
1	EICC/GeSI Template (Rev 3.01)		FY2014 survey form	<a href="#">▼DOWNLOAD</a>		June 16, 2014
~~~~~						
5	Add-up tool (2014 version)		Tool to check suppliers' answers, and to create your own answer from your suppliers' answers.	<a href="#">▼DOWNLOAD</a>		June 16, 2014
6	User's guide for Add-up tool	9p (A4)	Instruction and FAQ of Add-up tool (2014 version).	<a href="#">▼DOWNLOAD</a>		June 16, 2014
		56p (A4)	How to use the tool in details.	<a href="#">▼DOWNLOAD</a>		June 24, 2014

### JAMA Conflict Minerals Reporting Add-up Tool

## Flow Chart of JAMA Conflict Minerals Reporting Add-up Tool



### Important

When the Tool discovers an error or warning, a notice appears. Correct any errors or warnings then repeat process until there are no errors or warnings.



# 3-28. Step (4) : Rename Files Created by JAMA Conflict Minerals Reporting Add-up Tool

---

## Naming Rules for JAMA Reporting Add-up Tool Created Files

- Please add “2014\_(Company Code)\_” to the beginning of default file name.

### Error-checking Report

(Error & warning results via JAMA Conflict Minerals Reporting Add-up Tool)

File Name:

2014\_\*\*\*\*\*\_Check\_Report\_YYYYMMDDHHMMSS.xls  
(default file name: \_Check\_Report\_YYYYMMDDHHMMSS.xls)

This file will be created in the folder as “Follow”.

Please ensure that the file has no errors or warnings.  
(Please ensure that the number of “File with Follow-up”, the number of “File with Follow-up and Warning” and the number of “File with Warning” are zero and that the number of “File without Error” is equal to the number of checked files.)

# 3. Instructions for Survey and Reporting

Step(1) : Receive Survey Request from Nidec Group

Step(2) : Send Survey Request to Your Company's Suppliers

Step(3) : Collect Responses from Your Company's Suppliers

Step(4) : Summarize Collected Responses and Create Your Company's Response

**Step(5) : Send Response to Nidec Group**


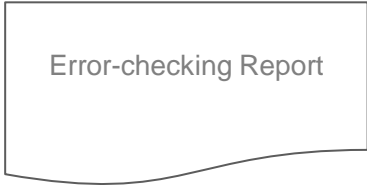
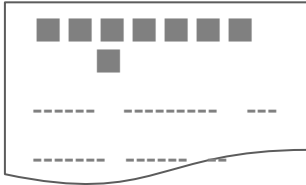
## 3-29. Step (5) : Confirm before Sending Response to Nidec

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### Final Pre-Sending Response Checklist

- ✓ Please confirm that all errors have been resolved in JAMA Conflict Minerals Reporting Add-up Tool error-checking results.
- ✓ Please confirm whether there are any attached files (materials for Questions C, D, H, I, etc.).
- ✓ Please perform a virus check on files and confirm they are clean before sending them. Macros are not enabled for the EICC-GeSI Template.
- ✓ Please confirm that the EICC-GeSI Template file has not been converted to PDF format (Please send as an Excel format file).

# 3-30. Step (5) : Confirm before Sending Response to Nidec

<p>Confirm Files to be Sent to Nidec Group (All files should be electronic files)</p>	<p>1. EICC-GeSI Template</p> 	<p>2. Final results after using JAMA Conflict Minerals Reporting Add-up Tool</p> 	<p>3. Attached files (if any)</p> 
<p>Confirm Set File Passwords</p>	<p>Please set passwords for files. However, do not set a password for the Excel file itself. Instead, set password for file compression (e.g., zip) or media (e.g. CD-R).</p>		
<p>Confirm Addressee</p>	<p>Nidec contact person from whom your company received survey request</p>		
<p>Confirm Sending Method</p>	<p>Please send as an email attachment or media (e.g. CD-R) by post. When sending email attachments, pay attention to file sizes. When sending media by post, please use registered mail.</p>		

# 4. Considerations, Glossary and FAQ

# 4-1. Survey Related Considerations & Nidec Information

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## ■ Considerations

- Nidec Group will only use information contained in survey responses for the purpose of meeting conflict minerals disclosure requirements. Your company's responses will not be disclosed to external parties.
- Please keep survey-related materials (materials used to draft your company's response) on hand for at least five years.

## ■ Nidec Contact

- For clarification of survey-related matters, please contact the Nidec contact person from whom your company received the survey request.

## 4-2. Glossary 1

Term	Description
Security and Exchange Commission (SEC)	A United States federal government agency created by the Securities Exchange Act of 1934 to regulate the US securities industry and enforce federal securities law. See <a href="http://www.sec.gov/about/whatwedo.shtml">http://www.sec.gov/about/whatwedo.shtml</a>
Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act)	2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, which requires persons to disclose annually whether any conflict minerals that are necessary to the functionality or production of a product originated in the Democratic Republic of the Congo or an adjoining country. See <a href="http://www.sec.gov/spotlight/dodd-frank/speccorpdisclosure.shtml">http://www.sec.gov/spotlight/dodd-frank/speccorpdisclosure.shtml</a>
Conflict Minerals	As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4): (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo or an adjoining country. See <a href="http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf">http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf</a>
DRC Conflict Free	Products that do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country. See <a href="http://www.squiresanders.com/pdf/Compliance/Form-SD-with-Instructions.pdf">http://www.squiresanders.com/pdf/Compliance/Form-SD-with-Instructions.pdf</a>
Adjoining Country	A country that shares an internationally recognized border with the Democratic Republic of Congo: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (as of April 2013)
Armed Group	An armed group that is identified as perpetrators of serious human rights abuses in the annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961 (22 U.S.C. 2151n(d) and 2304(b)) relating to the Democratic Republic of the Congo or an adjoining country. See <a href="http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf">http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf</a>
Recycled Metal	Reclaimed end-user or post-consumer products. Includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. See <a href="http://www.squiresanders.com/pdf/Compliance/Form-SD-with-Instructions.pdf">http://www.squiresanders.com/pdf/Compliance/Form-SD-with-Instructions.pdf</a>
Scrap	Processed metals created during product manufacturing.

## 4-3. Glossary 2

Term	Description
Electronic Industry Citizenship Coalition (EICC)	Established in 2004 to improve social, economic, and environmental conditions in the global electronic supply chain through use of a standardized code of conduct. Incorporated in 2007 as a formal industry association to ensure greater awareness of the Code, and to expand its adoption across the industry. See <a href="http://www.eicc.info/">http://www.eicc.info/</a>
Global e-Sustainability Initiative (GeSI)	A strategic partnership of the Information and Communication Technology (ICT) sector and organizations committed to creating and promoting technologies and practices that foster economic, environmental and social sustainability. See <a href="http://gesi.org/">http://gesi.org/</a>
Conflict Free Smelter (CFS) Program	A voluntary program in which an independent third party evaluates a smelter's procurement activities and determines if the smelter demonstrated that all the materials they processed originated from conflict-free sources. The program aims to enable companies to source conflict-free minerals. Companies that want to source responsibly will be able to use the results of the audits for their own company's due diligence program. See <a href="http://www.conflictreesourcing.org/conflict-free-smelter-refiner-lists/">http://www.conflictreesourcing.org/conflict-free-smelter-refiner-lists/</a>
EICC-GeSI Conflict Minerals Reporting Template	A standardized conflict minerals reporting template to help companies gather due diligence information in a common format, developed by the EICC and GeSI as part of these organizations' commitment to improving conditions in the supply chain. Designed to be used in conjunction with the Conflict Free Smelter (CFS) Program, together these tools enable more efficient transfer of information through the supply chain regarding country of origin and smelters and refiners being utilized by ICT companies and their suppliers. See <a href="http://www.conflictreesourcing.org/conflict-minerals-reporting-template/">http://www.conflictreesourcing.org/conflict-minerals-reporting-template/</a>



## 4-4. Frequently Asked Questions 1

Category	Question	Answer
Comprehensive	Is it illegal to procure conflict minerals from the Democratic Republic of Congo or adjoining countries?	No. Conflict mineral procurement activities are not illegal unto themselves. We are conducting this survey because companies listed on US stock exchanges must report their use of conflict minerals to the SEC.
Scope of Survey	Are only those companies selling or procuring in the US subject to these regulations?	No. Regardless of the region of sale or procurement, companies in the supply chain of companies listed in the US, regardless of where they are located, must provide information in order for US listed companies to meet their reporting obligations.
	Are products/parts containing only trace amounts of conflict minerals exempt?	No. There is no minimum level under which companies may avoid the survey. All products/parts containing conflict minerals are subject.
	Are recycled conflict minerals subject to survey?	Yes. If you are using recycled conflict minerals, please respond by tracing them back to the recycling facility.
	We use conflict minerals in the production process, but are parts/products that do not contain conflict minerals still subject to survey?	No. For example, even if the catalyst used in the production process or tools/machinery used for production contain conflict minerals, if the final product does not contain conflict minerals it is exempt.

## 4-5. Frequently Asked Questions 2

Category	Question	Answer
Scope of Survey	Many of our suppliers are subject to this survey. Are we required to request surveys from all of them?	Yes. In principle, send surveys to all of your suppliers. However, your company may respond for parts/products that clearly contain no conflict minerals. In these cases, please preserve materials that serve as the basis for your determination (We may use such materials for individual follow-up).
Issues Related Survey	We are receiving multiple requests from different contact persons within the Nidec Group. How should we handle them?	Nidec Groups sends out survey requests for each individual product unit, so there may be some overlap. Please prepare responses based on product list units as well. If you receive multiple requests for the same product list, please inform the requester of that fact.
	What should we do for parts/products procured through trading companies?	Please ask the trading company to request their supplier to complete the survey.
	What should we do if we know that the state of conflict mineral use changed after completing the survey?	Nidec Group will conduct another survey at the end of each year to confirm changes. Please report any changes at that time.

# 4-6. Handling of Personal/Other-than-Personal Information & Disclaimers

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## ■ Handling of Personal Information

Any personal information received will be handled in accordance with Nidec Group Privacy Policy only as required to achieve the following purposes:

- (1) Use for survey for information disclosure to US Securities and Exchange Commission based on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act conflict minerals disclosure requirements.
- (2) Use for survey regardless of physical location, when there are established laws, regulations, etc. similar to the above.

Within the scope of use defined above, Nidec Group may, without obtaining the consent of the party concerned in the information received, provide personal information to Nidec Group-contracted auditors (audit firms), consultants, the US Securities and Exchange Commission (US SEC) and other government institutions as required.

- \* Please see the URL below for Nidec Group policy on the protection of personal information:  
<https://www.nidec.com/ja-JP/inquiry/form/procurement/> (Japanese)

## ■ Handling of Non-Personal Information

Nidec Group uses information in EICC-GeSI Conflict Minerals Reporting Templates and other attached materials received from suppliers for the purposes as follows:

- (1) Use for disclosure to US SEC based on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act or associated audits.
- (2) Use for disclosure or audit regardless of jurisdictions, when laws or regulations similar to the above are established.
- (3) In addition to the above, use for efforts related to disuse of conflict minerals or supply chain management.
- (4) Use for supporting of industry organizations promoting disuse of conflict minerals (e.g., providing information of smelters to EICC, GeSI, etc.).

## • Disclaimers

- Nidec Group bears no responsibility and may not be held liable for any damages incurred by use of these materials (including other instructions), use results, incompleteness or unreliability.
- Nidec Group reserves the right to correct, change or edit these materials. Nidec Group bears no responsibility and may not be held liable for any damages incurred due to resulting changes.