

Supplier Code of Conduct

Nidec Motor Corporation (“NMC”) considers collaboration with the supply chain an integral part of its success and therefore strives to operate as an integrated team with suppliers. The selection of suppliers is based not only on the quality and competitiveness of their products and services, but also their adherence to social, ethical and environmental principles. NMC’s Supplier Code of Conduct helps us to select business partners who follow these principles and business practices that are consistent with our company’s values. These requirements are applicable to suppliers of NMC globally. Suppliers are also expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to this Supplier Code of Conduct. NMC may discontinue its relationship with suppliers who fail to comply with this Supplier Code of Conduct.

Ethics

1. **Highest Ethical Behavior:** Our policies and practices direct NMC employees to conduct business lawfully and ethically wherever we operate. We adhere to firm, uncompromising standards for NMC’s leadership and employees with respect to interactions with customers, suppliers, government agencies and the public and we demand that our suppliers support this requirement as they work on NMC business. Accordingly, our suppliers must use lawful business practices and provide their goods and services in compliance with all applicable laws and contractual obligations. All statements, communications and representations made to NMC must be accurate and truthful.
2. **Anti-corruption:** We expect our suppliers to comply with all laws and regulations forbidding payment of money, products, gifts or services, directly or indirectly, to any individuals or entities in order to corruptly induce favorable business treatment or to corruptly affect governmental decisions. Bribes, kickbacks and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity. Employees, suppliers and agents acting on behalf of NMC are strictly prohibited from offering or accepting such considerations under any circumstances.
3. **Conflicts of Interest:** NMC considers it inappropriate for suppliers’ employees to have any personal, business or financial interest that conflicts with his or her responsibilities to their employer.
4. **Ethics Hotline:** To facilitate reporting of ethics concerns, we provide NMC employees and suppliers an Ethics Hotline in the more than 80 countries in which we operate. Reports to the hotline are anonymous if requested. We tolerate no form of reprisal against employees or suppliers who report concerns. Suppliers are expected to assist NMC in enforcing this Supplier Code of Conduct by communicating its principles to their supervisors, employees, subcontractors and suppliers. Employees and suppliers can report a concern related to business conduct issues by calling NMC 's Ethics and Compliance Hotline toll free (in North America) at 1-877-522-7545 or collect at +1.770.582.5264.

Human Rights and Labor

1. **Conditions of Employment:** We stress to our suppliers the importance of operating with reasonable working hours to maintain a positive and productive work environment consistent with commonly accepted practices in each locale. Further, compensation practices should comply with applicable wage laws, including those relating to minimum wages, overtime compensation and legally mandated benefits.
2. **Forced Labor:** We oppose any form of forced, bonded or indentured labor, or involuntary prison work. Supplier must not participate in human trafficking; use forced, involuntary, or slave labor; or purchase materials or services from companies using forced, involuntary, or slave labor. Suppliers must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.
3. **Discrimination:** Our company expects suppliers to prohibit discrimination against or harassment of any employee or applicant on the basis of race, color, religion, sex, sexual orientation, age, disability, national origin, or any other factor deemed unlawful.
4. **Hiring and Employment Practices:** Suppliers' hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available. NMC's suppliers are expected to support diversity and equal opportunity in their workplaces. NMC's suppliers must also prohibit discrimination based on race, color, gender, national origin, age, disability, union membership, maternity, sexual orientation, or marital status. NMC's suppliers should respect the rights of workers to associate freely and seek representation in accordance with local laws.
5. **Humane Treatment:** NMC objects to any form of harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. In addition, suppliers must provide an environment that allows employees to raise concerns without fear of retaliation. Where it is allowed by law, suppliers should have a system that allows employees to anonymously report their concerns.
6. **Prohibition of Child Labor:** Our policies oppose child labor and we forbid our suppliers to use child labor in any facility or business.
7. **Working and Living Conditions:** We expect our suppliers to have a healthy and safe working environment in accordance with all applicable laws and regulations and to protect employees from short, immediate and long-term harm. Where housing is provided, we expect our suppliers to provide a healthy and safe living environment for employees in accordance with all applicable laws and regulations.
8. **Human Rights:** As a partner to NMC you must respect human rights and not willingly or knowingly assist in any violation of human rights, nor benefit from human rights abuses committed by another party, nor remain silent when human rights violations are being committed.

Other

1. **Environment:** Suppliers should operate their facilities in a manner that protects the environment and meets or exceeds applicable laws and regulations. We further stress the need to our suppliers to foster programs that reduce energy consumption and waste in their facilities and we emphasize the importance of creating innovative products and services that improve energy efficiency and reduce environmental harm.
2. **Management Systems:** Suppliers should maintain a management system that demonstrates adoption of the principles embodied in this Supplier Code of Conduct and that tracks and documents compliance with all applicable laws, government policies and regulations.
3. **Supply Chain Management:** NMC expects its suppliers to use their best efforts to extend the principles embodied in this Supplier Code of Conduct to their suppliers and agents that are engaged in the production, supply and support of products or services for NMC. Supply chain transparency is required to confirm compliance to this Supplier Code of Conduct. To monitor this, NMC may request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action.
4. **Confidential Information:** Suppliers must protect all NMC information, electronic data, and intellectual property or NMC technologies with appropriate safeguards. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of NMC and its suppliers. Suppliers may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement and must comply with their obligations to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Our suppliers can expect NMC to similarly safeguard their confidential information when authorization is provided to NMC. Suppliers may not use the NMC trademark, images, or other materials to which NMC owns the copyright, unless explicitly authorized.
5. **Supplier Diversity:** NMC appreciates the global and increasingly diverse business arena and acknowledges that we must reflect that environment in our customers, business practices, and most notably, our suppliers. NMC also expects its suppliers to exercise diversity in their daily business when it comes to their employees as well as in their decisions to select their suppliers and subcontractors.
6. **Conflict Minerals and Chemical Substances:** NMC's suppliers must ensure compliance with product-related requirements, such as REACH, RoHS or Conflict Minerals, and may be required to declare the material content and origin of products delivered to NMC.