

Establishment of "Compliance Code of Conduct"

In recent years, compliance is viewed in Japan as increasingly important and compliance violation constitutes a serious risk for Japanese companies, as the country converts from an ex-ante regulation type society to an ex-post punishment and relief type one; as corporate scandals are criticized increasingly severely by society and the mass media; as information control becomes difficult with the further spread of Internet use and increasing cases of whistle-blowing in companies; as authorities abroad take a stricter approach and impose severer penalties; and as strategies and tactics of a global standard are required amidst the intensive international competition.

In particular, Nidec Group is committed to strict compliance with all relevant laws and regulations, etc., as it rapidly globalizes its operations, enters and expands the automobile and other businesses, which affect the safety of human lives and health, and in general expands its operations, thus drawing more and more the attention of the public.

Fully recognizing this situation and the according business environment and in order to reinforce Nidec Group's compliance implementation structure, we have decided to enact several measures including the following:

1. Enactment and release of "The Compliance Code of Conduct"
2. Preparation of a "Nidec Group Compliance Manual" and its dissemination to all executives and employees
3. Setup of an internal violation report window outside of the company additionally to the Compliance Office; with this and by making the internal violation report system more familiar to all employees, a system for early and far-reaching detection of compliance violation risks is put into place.

"The Compliance Code of Conduct" stipulates specific guidance for Nidec Group to comply not only with domestic/foreign laws, rules and regulations but also social rules, ethics, etc. in the company's daily business activities. It constitutes an official and uniform code of conduct with regards to compliance, combining the various ethics provisions, which have so far been stipulated in several internal company regulations, such as the "Compliance Rules", and rules for the prevention of violations of laws and regulations that are categorized to be included in the code of conduct.

"Nidec Group Compliance Manual," giving form and substance to "The Compliance Code of Conduct," is a guideline on how each Nidec Group executive/employee should behave in his/her daily work. Full use will be made of it as the fundamental tool for establishing genuine compliance based on the considerations and notions of each employee.

The internal violation report window setup outside of the company will be established in order to detect compliance violation risks, such as the violation of "The Compliance Code of Conduct," etc. as early and completely as possible, by providing employees with a neutral and unbiased contact window.

With these measures, we, Nidec Group, declare to unwaveringly stay on the "royal road of business management" as a global manufacturer that contributes to the realization of a sustainable society, promoting sound business practices while keeping in mind the spirit of "The Compliance Code of Conduct" amidst the ever-changing laws, rules and demands that society places on companies.

Subject of "The Compliance Code of Conduct" and "Nidec Group Compliance Manual" are all Nidec Group companies and all of their directors, auditors, officers and other employees; both will be applied after required procedures at each group company have been completed.

January 2011

 [The Compliance Code of Conduct](#)

Inquiries should be addressed to:

Nidec Corporation

Compliance Office

Address: 338 Tonoshiro-cho, Kuze, Minami-ku, Kyoto 601-8205, Japan

TEL: +81-75-935-7777 (direct line)

FAX: +81-75-935-6031