

Conflict Minerals Control Policy

Tokuriki Honten endeavors to conduct sound business recognizing the importance of corporate social responsibility in obedient to our Charter of Corporate Behavior.

In the procurement of materials containing Gold, Tantalum, Tin and Tungsten used for our production processes, we perform risk management to avoid procuring conflict minerals from Conflict-Affected and High Risk Areas with human rights abuses such as genocide, ethnic cleansing, violence, ill-treatment, torture, enslavement, trafficking of persons, the worst forms of child labor, forced labor; terrorist financing; money laundering and unfair business. Any transaction found to be involved in such areas shall be stopped immediately by performing due diligence.

In this context, we are committed to perform "Conflict Minerals Control" by the following six steps below, in accordance with "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas", "LBMA Responsible Gold Guidance" and other corresponding guidance of allied business organizations :

1. Establish strong company management system

Internal management system to perform Conflict Mineral Control shall be established and implemented under the supervision of Compliance Officer appointed by Senior Management.

2. Avoid any procurement of materials from conflict-affected and high risk areas

Gold and 3Ts(Tantalum, Tin and Tungsten) originated from the Democratic Republic of Congo ("DRC") and adjoining countries shall be defined as the Conflict Minerals from conflict-affected and high risk areas, and procurement of such Conflict Minerals shall be avoided.

3. Perform due diligence for supply chain

Due diligence for supply chain of the materials shall be performed, and any transaction found to be involved in conflict- affected and high risk areas shall be stopped immediately.

4. Perform training for Conflict Minerals Control

Education and training for Conflict Minerals Control shall be performed for the personnel involved in the implementation of our management system.

5. Monitor all transaction and control safekeeping of their records

All the materials to be received shall be monitored by checking with transaction documents. Transaction documents and receipt records shall be under control of safekeeping for prescribed period.

6. Arrange for independent third-party audits and report the result

Our management system for Conflict Minerals Control and practices shall be audited periodically by independent third party, and the practices shall be reported.

Established on Feb. 1, 2012

Tokuriki Honten Co., Ltd.