

# Full Compliance with Laws and Regulations

The OKI Group has worked to strengthen compliance in order to comply with all related laws and regulations and implement sound corporate activities consistent with social norms. Under the leadership of the Compliance Committee headed by the Chief Compliance Officer, we focus on the enhancement of training and the promotion of integrated, systematic, companywide risk management. Furthermore, we have established consultation and reporting channels as well as whistle-blowing regulations such as those about the protection of whistle-blowers, thus tried to discover and rectify improper activities at an early stage if any.

## I Revision of the OKI Group Code of Conduct

At the meeting of OKI's Board of Directors on December 28 of 2011, a revision of the OKI Group Code of Conduct was resolved. The purpose of the revision was to present a clear-cut stance on corruption prevention (for which relevant laws have been reinforced on a global level) and the elimination of antisocial groups as the OKI Group.

### Major Changes in the Revised Code

#### II. Fair Corporate Activities

- ③ We will not give, offer or accept bribes, whether in cash or otherwise, to or from any third party, including but not restricted to government officials, customers or their representatives.
- ④ In case of donations and political contributions, we will first consider the necessity and appropriateness carefully, and then we will make only appropriate donations and political contributions in accordance with applicable laws and regulations and company rules.
- ⑩ We will resolutely confront antisocial groups and criminal organizations that pose a threat to the order and security of civil society and all contact with such entities is strictly forbidden.

## I Enhancement of Compliance Education

In order to disseminate compliance-related measures across the group, the OKI Group gives training sessions for Compliance Managers at six sites in Japan. Participants in these sessions roll out the knowledge learned in their business units. The dissemination of such knowledge is checked through an e-learning program for all executive officers and employees of the group.

In October 2011, we published a booklet called "Case Examples of



Case Examples of Compliance

Compliance" that features possible compliance problems and actions to be taken in a Q&A style. Copies of the booklet have been distributed to all Compliance Managers. We have also encouraged participants in various training programs to effectively use the booklet by distributing copies thereof.

- Participation rates in compliance education programs (for the OKI Group in Japan) in fiscal 2011

Training sessions for Compliance Managers	100%
e-learning program (about on-the-job compliance)	98%

## I Improvement of Measures to Deal with Compliance Risks

OKI has steadily promoted risk management based on its Risk Management Regulations and established a system to deal with any risk. As OKI regards compliance risks\* as the most important category thereof, each business unit of the company needs to register potential risks related to its operations with the Risk Management Promotion Office. We have also established a management cycle to develop measures against them and monitor the implementation thereof within the group on a regular basis.

In fiscal 2011, we extended this cycle from 6 months to one year for the purpose of improving managerial efficiency and the effectiveness of measures taken. In order to prevent this extended cycle from becoming a mere routine, we reinforced communication between applicable group companies, and adopted a more effective way for monitoring. Furthermore, we continued to reinforce risk management at overseas sites, and established a basic framework for promoting compliance at almost all sites.

\* A compliance risk: a risk associated with violation of laws, regulations and in-house rules

## I Emergency / Disaster Response

The OKI Group has established "Safety Countermeasures Committees" and emergency communication networks at its domestic and overseas sites as well as its group companies. In the event of a disaster, appropriate countermeasures are enacted to protect people's lives, prevent secondary accidents, contribute to local communities and foster good relationships with them, and ensure the continuity of business operations. As for the continuity of business operations, we set guidelines for formulating a BCP (Business Continuity Plan) in fiscal 2008.

In fiscal 2011, we redesigned the BCP for each business segment based on lessons and reflections from our responses to the Great East Japan Earthquake, planned blackouts, and nation-wide campaigns for saving energy. When floods hit the production site in Thailand in October, its employees worked hard to recover from the damage through close communication with related group companies, and strengthened measures against flooding (See Page 15). We will continue to make our utmost efforts to appropriately deal with any disasters such as an earthquake.