

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. We thus try to discover and rectify improper activities at an early stage.

Enhancement of Compliance Training

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

In fiscal 2012, in order to confirm the compliance issues being promoted in the Group and to reflect them in policies, a compliance awareness survey was done when e-learning was held in November. Also, a booklet called "Case Examples of Compliance" that features possible compliance problems and actions to be taken in a Q&A style was handed out in training sessions held for each employee rank. A series of compliance example explanation articles were also published in our

company news (intranet). We are thus strengthening our work to communicate training information in specific formats.



Our company news published a series of articles explaining compliance examples

Participation rates in compliance training programs (for the OKI Group in Japan) in fiscal 2012

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

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 risks. As OKI regards compliance risks* as an especially 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 2012, top management of divisions where prevention polices were deployed fully participated in activities, and we strengthened communication between risk management divisions and divisions where deployed, so prevention polices are solidly implemented where deployed.

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

For Fair Business Activities

To practice fair business activities, our "OKI Group Code of Conduct" clearly states that we comply with each country's and region's regulations on prohibition of monopolies and fair competition, we work for fair and free competition, and that we do not give bribes of money nor in other forms to any third parties (government officials, customers, agents, etc.), nor do we receive bribes from third parties. This is thoroughly implemented in all group companies. In fiscal 2012, we provided training in e-learning (workplace compliance) regarding trends in corruption prevention related regulations (Foreign Corrupt Practices Act, UK Bribery Act, etc.) which are becoming stricter globally.

Initiatives in Procurement Activities

The cooperation of suppliers and customers in our supply chain is essential to fulfill our social responsibilities. Based on this awareness, OKI works to build trusting relations as a partner, and the "OKI Group Procurement Policy" raises "Compliance with laws, regulations, and societal norms," "Environmental considerations," "Appropriate management and protection of information," etc. as cooperation "Requests for suppliers." In fiscal 2012, "Continue supplying when unavoidable situations occur such as disasters" and "Basic policy for conflict minerals illicitly mined in conflict-affected regions" were added to this policy, and it was revised.

Emergency / Disaster Response

The OKI Group has established "Safety Countermeasures Committees" and emergency communication networks at its domestic and overseas sites, as well as in 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 continuity of business operations. For continuity of business operations, in fiscal 2008 we set guidelines for creating a Business Continuity Plan (BCP).

In fiscal 2012, based on announced revisions of the damage scale and scope of an earthquake directly under the capital, Nankai Trough Huge Earthquake, etc., each business proceeded to revise its BCP, and we also proceeded to revise the BCP of the corporate (headquarters) division. In order to accurately respond to risks such as earthquakes, we will continue to work on this as a Group.