



JCM Group

CONFLICT MINERALS GUIDELINE

**(Information for Our Suppliers – JCM
Guideline for Management of Conflict
Minerals)**



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Chapter 1 General Rule

1. Introduction

Pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act (hereinafter referred to as the “Dodd-Frank Act”) which requires publically traded companies to provide disclosure regarding their use of gold, tin, tungsten and tantalum (known as Conflict Minerals, hereinafter referred to as “Conflict Minerals”) originated in the Democratic Republic of Congo and its neighboring countries (hereinafter referred to as the “DRC region”) with an aim to cut off the financial resources to the armed groups in the DRC region, JCM Group has created the following policy and the guideline. In accordance with this policy and the guideline, JCM would like its suppliers to investigate whether or not the materials or the parts used for its products contain Conflict Minerals and to report to us.

2. JCM Group’s Policy for Conflict Minerals

◆ Non use of Conflict Minerals

“Because of the concern that the use of minerals originated in the DRC region where conflicts are ongoing helps support the inhumane acts committed in the region,” the Dodd-Frank Act was passed in the U.S in July, 2010, which directs the Securities and Exchange Commission to issue rules requiring publically traded companies in the U.S. to disclose whether or not their products contain Conflict Minerals.

JCM is not a publically traded company in the U.S, but to respect for the purpose of this law and to fulfill its role in the supply chain, JCM shall promote non use of Conflict Minerals. JCM shall be requesting its suppliers to investigate where the minerals used in their products come from. And if it turns out that their products contain Conflict Minerals, JCM shall request the suppliers to use “Conflict Free” minerals and if no improvement is seen, JCM shall cease to do business with them.

3. Conflict Minerals Guideline

3.1 Objective

The objective of this guideline is to clarify the rule of procurement to all JCM Group’s suppliers in order to achieve Conflict Free policy and to promote non use of the products containing Conflict Minerals.

JCM Group shall comply with the law relating to Conflict Minerals and require its suppliers to report whether the minerals contained in the materials, parts, units used for their products are Conflict Minerals. JCM’s objective is to eliminate Conflict Minerals from its supply chain.

3.2 Scope


This guideline shall apply to the rule requiring the disclosure of the use of Conflict Minerals regulated by the Dodd-Frank Act.


1) Scope of application to products


This guideline shall apply to all the JCM brand products sold to publically traded companies in the U.S.

- 2) Scope applicable to components and parts, raw materials and units, etc.
 - (1) Products, components, and the materials used for them.
 - (2) Service parts

- 3.3 Documents to be submitted
 - 1) Receipt of JCM Group's Conflict Minerals Guideline
When you receive a copy of the JCM Group's Conflict Minerals Guideline or the revised guideline, please submit a receipt.
 - 2) Questionnaire on the materials / parts delivered to JCM Group
Please fill out the questionnaire.

- 3.4 How to submit 
Please submit the documents to Mr. Tsuka, QC Dept. Information Management G. via e-mail
Email address: tsuka@jcm-hp.co.jp

- 3.5 For more information 
Please contact the following person for more information regarding the documents being submitted:
Tomohiko Tsuka, QC Dept. Information Management G.: TEL06-6703-8402

- 3.6 JCM's website 
JCM Group's Conflict Minerals Guideline is posted on JCM's website.
URL: <http://www.jcm-hq.co.jp/>

Please refer to <http://www.conflictreesmelter.org> for detailed information (documents) relating to Conflict-Free Smelter Program.

Receipt of JCM Group's Conflict Minerals Guideline

We acknowledge the receipt of the document described below and submit a receipt note for the document.

We agree to responsibly dispose of the old version of the document to prevent it from being erroneously used.

1. Document Name

JCM Group's Conflict Minerals Guideline

2. Document Version No.

Version No.

3. Date of receipt

Day, Month, 2014

4. Company Name

5. Department

6. Contact Person

_____ seal

Questionnaire on the materials / parts delivered to JCM Group

Date: _____
 Company name: _____
 Address: _____
 TEL: _____ FAX: _____
 Title: _____
 Contact person: _____

1) Are any of the following minerals necessary to the functionality or production of our products your company manufactures or contracts to manufacture? (If your answer to them all is No, this is the end of the questionnaire.)

	Yes / No	Comments
Tantalum (Ta)		
Tin (Sn)		
Gold (Au)		
Tungsten (W)		

2) Are the following minerals (necessary to the functionality or production of our products) originated in the Democratic Republic of Congo and its neighboring countries (the "DRC region")?

	Yes / No	Comments
Tantalum (Ta)		
Tin (Sn)		
Gold (Au)		
Tungsten (W)		

3) Are the following minerals (necessary to the functionality or production of our products) procured from recycling manufacturers or scrappers?

	Yes / No	Comments
Tantalum (Ta)		
Tin (Sn)		
Gold (Au)		
Tungsten (W)		

4) Has your company completed inquiries regarding Conflict Minerals to all your suppliers?

Tantalum (Ta)
Tin (Sn)
Gold (Au)
Tungsten (W)

Yes / No

Comments

5) Have your company and/or your suppliers identified all the smelters where the following minerals contained in the products were processed?

Tantalum (Ta)
Tin (Sn)
Gold (Au)
Tungsten (W)

Yes / No

Comments

6) Do all the smelters your company and/or your suppliers are using where the following minerals contained in the products were processed conform to Electronic Industry Citizenship Coalition's (EICC) Conflict Free Smelter (CFS) Program, and are they listed in the Compliant Smelter List?

Tantalum (Ta)
Tin (Sn)
Gold (Au)
Tungsten (W)

Yes / No

Comments

Please answer the following questions:

	Yes / No	Comments
A) Is your company aware of Conflict Minerals?		
B) Does your company conduct any activities for Conflict Minerals?		
C) Does your company have a policy to eliminate Conflict Minerals?		
D) Is the policy posted on your company's website?		
E) Is your company requesting your suppliers who are using Conflict Minerals to eliminate Conflict Minerals?		
F) Is your company requesting your suppliers to procure these minerals from the CFS-compliant smelters who are listed in the EICC's Compliant Smelter List?		
G) Is your company exercising due diligence to eliminate Conflict Minerals?		
H) Is your company requesting your suppliers to disclose the names of smelters they procure these minerals from?		
I) Is your company reviewing due diligence reports from your suppliers?		
J) Does your company's review process include corrective actions?		
K) Is your company required to disclose the use of Conflict Minerals to the Securities and Exchange Commission?		

Thank you for your cooperation.