

Conflict Minerals Control Policy

Katagiri Kikinzoku Kogyo is recognizing the importance of corporate social responsibility, and making effort to be safe and reliable company for customer and global environment. Particularly we perform risk management to receive the gold.

We are committed to avoid any procurement of materials from conflict affected and high risk areas (Democratic Republic of Congo and adjoining countries) with human rights abuse, terrorist financing, money laundering, and unfair business. In this context, we implement the following 5steps below.

1. Construction of Management System

Internal management system to perform to avoid conflict minerals is constructed and implemented under the supervision of Compliance Officer.

2. Measuring Risk

We define and correctly separate all received gold, alloys, scraps, solution, and industrial products in accordance with “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas”.

3. Risk assessments of Suppliers

We carry out risk assessment with respect to suppliers and any transaction found to be involved in conflict-affected and high risk areas or to be connected any criminal behaviors shall be stopped immediately.

4. Education and Training

We compliment continuous enough education and training internally for all the persons concerned in this policy.

5. Monitoring and Recording

All the materials to be received shall be monitored so as to ensure that they are consistent with information obtained from suppliers, and Compliance Officer checks them at fixed interval. Its receipt records shall be under control of safekeeping for prescribed period.

Established on Nov. 4, 2014
Katagiri Kikinzoku Kogyo Co., Ltd.