



SHINANO INC.

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Responsible Mineral Procurement Policy

Minerals such as tin, tantalum, tungsten, and gold (3TG) mined in the Democratic Republic of Congo and its neighboring countries (DRC and neighboring countries) and high-risk areas (CAHRAs) are feared to be a source of funding for armed groups in conflict areas through illicit mining and trade.

Against this backdrop, the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) enacted in July 2010 requires companies listed on the U.S. stock market to disclose information on their use of four minerals (tantalum, tin, tungsten, and gold) produced in these regions in order to cut off funding for armed groups.

Although SHINANO INC. is not a U.S. listed company, in order to fulfill our social responsibility as a corporation, we will conduct appropriate investigations of our suppliers and aim to procure materials that are not related to these conflict minerals in the manufacture of our products.

We will take the following actions:

1. We will not use conflict minerals illegally mined in DRC or adjoining countries as raw materials for our products.
2. If any of these conflict minerals are found to be contained in components or raw materials, we will take appropriate measures such as immediately discontinuing their use.

President

Hiroyoshi Izumisawa