The Tanaka Kikinzoku Group is committed to driving corporate social responsibility initiatives. As part of these efforts, it implements measures to achieve socially responsible raw mineral procurement that takes human rights, the environment and ethics into account. When procuring minerals, it seeks to reasonably assure that the tantalum, tin, tungsten and gold (the 3TG conflict minerals) in its products do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in conflict-affected areas. It shall exercise due diligence on the supply chain of conflict minerals, and make its due diligence measures and results of these investigations available upon customer request.

The Tanaka Kikinzoku Group believes in the importance of risk management in raw minerals procurement, particularly gold, in which it has many dealings, and for this reason it has established its Conflict Mineral Management Policy Concerning Gold. In 2014, with updates in each subsequent year, its management system passed a third-party audit following the Responsible Gold Guidance developed by the LBMA.

The Tanaka Kikinzoku Group conducts risk management concerning its gold trading activities. To avoid procurement that may be connected to human rights abuses, terrorism, money laundering or unfair dealings and practices in conflict-affected and other high-risk areas, it implements the following management measures.

1. Construction of Management System
The Tanaka Kikinzoku Group has established a system for supervising suppliers that may be connected to conflict, and it has assigned a supply chain officer to implement the conflict mineral management system.

2. Risk Assessments of Materials and Suppliers
The Tanaka Kikinzoku Group will carry out risk assessments with respect to gold and its suppliers under the conflict mineral management system. In the case it becomes clear that any material is connected to conflict, or that any supplier to the Group is involved in money laundering or unfair dealings and practices, the Group will immediately work to terminate the purchase or trade.

3. Education and Training
The Tanaka Kikinzoku Group will carry out ongoing internal education and training for all Group personnel who are involved in our conflict mineral management system.

4. Monitoring and Recording
The Tanaka Kikinzoku Group will monitor the gold received so as to ensure that they are consistent with the information obtained from suppliers, and properly maintain records.

5. Third-Party Audit
The Tanaka Kikinzoku Group will periodically undertake audits conducted by an appropriate independent third-party organization with respect to the maintenance and implementation of the conflict mineral management system established within the Group.