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Conflict Mineral Management Policy

TANAKA KIKINZOKU KOGYO K.K., TANAKA KIKINZOKU HANBAI K.K. and TANAKA KIKINZOKU INTERNATIONAL K.K. (the "TANAKA KIKINZOKU GROUP companies") are continuing to promote various aspects of corporate social responsibility throughout their organizations and in their policies. In that connection, the TANAKA KIKINZOKU GROUP companies have recognized the risks particularly with dealing in gold materials supplied from so-called Conflict-Affected and High-Risk Areas in which human rights abuse, terrorism, money laundering, and related unfair dealings and practices have been recorded. In order to avoid dealing in gold material from such areas, the TANAKA KIKINZOKU GROUP companies implement the following management measures.

1. Construction of Management System

The TANAKA KIKINZOKU GROUP companies have established a system for supervising suppliers to the TANAKA KIKINZOKU GROUP companies that might have some connection with Conflict-Affected and High-Risk Areas, and have assigned a supply chain officer to implement the conflict mineral management system.

2. Avoidance of Gold originating from Conflict-Affected and High-Risk Areas

The TANAKA KIKINZOKU GROUP companies define gold originating from the Democratic Republic of the Congo and neighboring countries as conflict mineral from Conflict-Affected and High-Risk Areas, and will not accept the supply of such conflict mineral.

3. Risk Assessments of Materials and Suppliers

The TANAKA KIKINZOKU GROUP companies will carry out risk assessments with respect to supplied materials and suppliers. In the event it becomes clear that any material has been sourced from a Conflict-Affected or High-Risk Area, or in the event it becomes clear that any supplier to the TANAKA KIKINZOKU GROUP companies is involved in human rights abuse, terrorism, money laundering, or related unfair dealings and practices, the TANAKA KIKINZOKU GROUP companies will immediately work to terminate the transactions of the relevant materials or with the relevant suppliers.

4. Education and Training

The TANAKA KIKINZOKU GROUP companies will carry out continuous education and training internally for all TANAKA personnel who take part in our conflict minerals management system.

5. Monitoring and Recording

The TANAKA KIKINZOKU GROUP companies will monitor the materials received so as to ensure that they are consistent with the information obtained from suppliers and maintain records properly.

6. Third-Party Audit

The TANAKA KIKINZOKU GROUP companies 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 TANAKA KIKINZOKU GROUP companies.

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TANAKA HOLDINGS Co., Ltd
President & CEO
Akira Tanae