

Automotive & Industrial Systems Company Panasonic Corporation Policy of Non-use of Conflict Minerals

Panasonic Corporation is not a publicly-traded company listed on U.S. stock exchanges, which are subject to the Dodd-Frank Wall Street Reform and Consumer Protection Act. However, Panasonic considers the issue of conflict minerals to be of grave concern as a source of funding for organizations that are involved with human rights abuses, environmental destruction, bribery, and other unlawful activities in conflict areas and is working to ensure the non-use of such conflict minerals.

The Automotive & Industrial Systems Company adopts the policy of implementing the following activities to achieve responsible procurement in a specific manner.

- We agree with the objectives of the final rule on Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act relating to the use of conflict minerals adopted by U.S. stock exchanges and the U.S. Securities and Exchange Commission (SEC) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas started by the Organization for Economic Cooperation and Development (OECD).
- We will use the Conflict Mineral Reporting Template (CMRT), which is the industry standard, and continue to conduct surveys and carry out analyses by tracing back through supply chains in cooperation with Tier 1 suppliers.
- We will establish an internal management system, implement the PDCA cycle based on the Manual for Actions Related to Conflict Minerals formulated as part of a management system for conflict minerals, and continue to ensure due diligence through actions including identifying risks and taking adequate corrective measures.
- We will disclose processes of identifying risks based on evaluation standards and taking corrective measures if necessary in response to requests and expectations from customers and other stakeholders.

Through the above-mentioned activities, we will aim to identify smelters and promote procurement from Conflict-Free Smelters (CFSs) by taking into consideration any impact on the entire value chain related to products and services.

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Shinsuke Nakahori

Director, Business Infrastructure Enhancement Center
Automotive & Industrial Systems Company
Panasonic Corporation

松下电器产业株式会社 汽车电子和机电系统公司 冲突矿物应对方针

Panasonic并非适用美国金融监管改革法的美国证券交易所公开对象企业，但就把在冲突地区各国内侵害人权、破坏环境、渎职等不正当行为有关的组织的资金源的冲突矿物问题视为重大课题非常关注，并对内部外部广泛宣扬致力于不使用冲突矿物。

在汽车电子和机电系统公司，为具体实现负责任的采购而进行如下活动，即为此应对方针。

- 赞同美国证券交易所/SEC冲突矿物限制 最终规则以及经济合作与发展组织（以下，简称OECD）的冲突矿物尽职调查指导方针的主旨。
- 采用作为行业标准规格的CMRT (Conflict Mineral Reporting Template)调查表，在一级供应商的协助下，追溯供应链并持续实施调查和分析。
- 构建公司内部管理体制，基于作为冲突矿物应对管理体系制定的“冲突矿物应对要领”实施PDCA循环，确定风险以及持续实施正确的更正对策，即，尽职调查。
- 根据包括客户在内的利益相关者提出的要求和期待，必要时基于评价基准确定风险以及公开更正对策程序等。

通过上述活动，考虑对商品和服务相关价值链整体的影响，以期确定冶炼所及从符合CFS冶炼企业进行采购。

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松下电器产业株式会社

汽车电子和机电系统公司

事业基础强化中心 中心长 中堀 真介

