

## Compliance

### WEB

AISIN Charter of Corporate Behavior  
Behavioral Ethics Guideline



Monthly poster to enhance ethical business activities

### Basic approach

AISIN has instituted the AISIN Charter of Corporate Behavior with the aim of setting behavioral standards that must be implemented so that we can fulfill our responsibilities to society.

We declare within the charter that we will respect all laws applicable inside and outside Japan and international rules and that, as well as respecting the spirit of these laws and rules, we will behave in a spirit of social responsibility.

### System

AISIN has set up a Business Ethics Committee with the company's vice president as chairman and its executives as committee members as an institution whose function is to discuss important matters related to corporate ethics and to decide on policy in this regard.

Discussions in connection with corporate behavioral ethics may be had both inside the company (Legal Affairs Department) and outside the company (law offices).

### Consultation and notification contact points

Our corporate behavioral ethics consultation contact points accept notification and consultation regarding compliance via telephone, fax or e-mail, and access is readily available not just to employees but also to their families and business partners. We have also opened external contact points to Group companies, and the use of these points by Group company employees is increasing.

Clear regulations have been created to ensure that the provider's name and the content of notifications and consultations provided via contact points remain confidential, and notification recipients and consultants protect this confidentiality. To ensure that parties providing notification or seeking consultation are not mistreated as a result, information concerning any such mistreatment is communicated promptly to notification recipients and consultants, who communicate with the manager of department involved and provide thorough training on eliminating such mistreatment.

Internal bulletins and other channels have helped promote an awareness of these contact points. Accordingly the number of consultations and notifications has increased each year. In fiscal 2008, contact points handled 94 consultations and notifications, eight of them from outside the Company. In fiscal 2009, this number rose to 125,

including 17 from outside the Company. For the 12 main Group companies, the total for fiscal 2009 was 254, including 20 from outside the company.

### Ensuring full awareness on the part of employees

AISIN has drawn up a "Behavioral Ethics Guideline" to serve as a guide, which is distributed to all employees as they strive to act in strict accordance with rules and manuals. We hold training and theme-based training in connection with compliance every year targeted at specific groups in the corporate hierarchy and encourage all employees to raise their awareness of compliance and to acquire knowledge concerning individual laws and regulations. In fiscal 2009, we provided training on such themes as the Antimonopoly Law, export controls and the Copyright Act. October every year is stipulated as the month when particular efforts are made to strengthen corporate behavioral ethics. Educational activities are implemented including the holding of talks and lecture, soliciting ideas for mottos and slogans, and presenting commendations.

#### Compliance Training by Rank

Officers	145
Managers	842
General employees	2,509 Of which, new employees (including mid-career hires) numbered 1,229
Agency workers	172
Total	3,668

(From 12 main domestic subsidiaries)

We also promote compliance by conducting case studies at each workplace. We present cases that involve a question of compliance violations, and discuss where problem lie and how such violations can be prevented, assisting smooth communication I the workplace. The Behavioral Ethics Guideline and case studies are available in other languages for people who do not use Japanese on a daily basis.

In fiscal 2009, we supplemented these activities by keeping employees informed through inclusion of questions and answers on compliance in internal magazines.