

## Information Security

### Basic approach

AISIN has established the following guidelines, among other measures, to prevent leakage of confidential information and personal information.

- Confidential Information Management Rules
- Personal Information Protection Policy
- Personal Information Protection Rules
- Cyber Information Security Management Rules

These guidelines stipulate the need to comply with laws, regulations and social norms when handling personal information belonging to customers, business partners and employees, and there are being strictly observed.

### System

Under a system advanced companywide and supervised by the General Affairs Department, we place confidentiality managers in each department to take measures to prevent information leakage. To respond to any information leaks or suspected leaks that should occur, we have established an Emergency Countermeasures Headquarters to investigate the leakage, prevent secondary damage and provide for the parties affected.

Moreover, besides educating the responsible persons and each management level of the organization, in 2009 we began keeping all employees thoroughly informed on these matters through e-learning programs.

There were no leakages of confidential or personal information in fiscal 2009.

### Cyber Information Security

AISIN specifies procedures for protecting its information and information systems in its Cyber Information Security Management Rules. The Company designates security levels for each building according to the importance of the information housed, and manages the facilities and monitors who enters and exits based on the respective security levels.

Moreover, to prevent information leakage due to computer theft and loss, we require that employees get permission to remove computers from the premises, and we have implemented security software to prevent leakage even in the event of theft or loss.

## Disclosure of Information

### Basic approach

We disclose information in a fair and timely manner to ensure that our stakeholders, including shareholders and other investors properly understand and trust AISIN.

### System and Efforts

We report immediately to individual sectors and information controllers in group companies (general managers within Aisin Seiki; executive class in group companies) in connection with issues involving individual councils and important facts occurring inside and outside AISIN.

Information controllers who receive reports convene meetings of assessment committees consisting of the representatives of Corporate Planning Dept., Finance & Accounting Dept., and Legal Affairs Dept. Decisions are reached at these

meetings on whether or not it is necessary to disclose information at appropriate times in light of the rules of disclosure laid down by securities exchanges. The decisions are reported to directors and promptly disclosed through TD net\* and other means. Furthermore, the Aisin Seiki website contains a variety of corporate information and includes an e-mail notification service for all who wish to stay abreast of statements of account and news releases.

In addition, to prevent insider trading we obtain written pledges from each officer and related employee concerning information management and trading of stock and other instruments. We also conduct educational sessions on insider trading regulations as needed, as part of our efforts to raise awareness.

\* TD net: Web-based disclosure service of the Tokyo Stock Exchange