

Compliance

The social responsibilities of corporations are strongly called into question these days. That is why it is essential that a corporation, which is also a member of society, complies with the laws, regulations and ethics in order to continue to develop and grow positively. In ROHM's fundamental operational policy of "appropriate profits ensured by thorough quality control activities," the major premise is that all officers and employees carry out equitable and fair corporate activities from a higher ethical viewpoint. In the ROHM Group, compliance is considered to be a major issue that needs to be addressed. Each officer and employee of the Group will always firmly comply with laws, regulations, and corporate ethics, as well as carry out daily business in good faith based on social common sense. In addition to striving to establish a compliance system that maintains internal policies, ROHM continues to strengthen compliance within the entire ROHM Group, which includes overseas divisions, by carrying out internal educational activities and utilizing opportunities.



Compliance card

[2008 efforts and 2009 targets and topics]

In 2008, in order to promote the use of the compliance hotline, ROHM prepared compliance cards which contained consultation and reporting contact information, and distributed them to all ROHM employees at its Headquarters and domestic affiliates. ROHM has set up a "Compliance Hotline Reception Room" to preserve the privacy of employee consulting and/or reporting. In addition, ROHM has provided compliance trainings, from new employees to managers, in order to promote awareness. Planned efforts for 2009 include a compliance consciousness survey and thorough training on individual themes such as the prevention of insider trading. ROHM will continue to study enhancing its compliance system through the establishment of compliance leaders both internally and foreign affiliates.



Compliance training scene (2.27.2009)

Regarding ROHM's compliance system

■ Establishment of a compliance committee

In order to establish, maintain, inform and promote the appropriate compliance system as a corporation, ROHM has established a Compliance Committee, chaired by a director, in order to prevent compliance violations. Auditors and the head of the auditing office attend as observers and coordinate with the auditing of daily operations.

■ Establishment of compliance leaders

At ROHM Headquarters and domestic affiliates, compliance leaders and sub-leaders are established for each division under the Compliance Committee to further promote on-site compliance for corporate activities.

■ Establishment of a consultation and reporting line

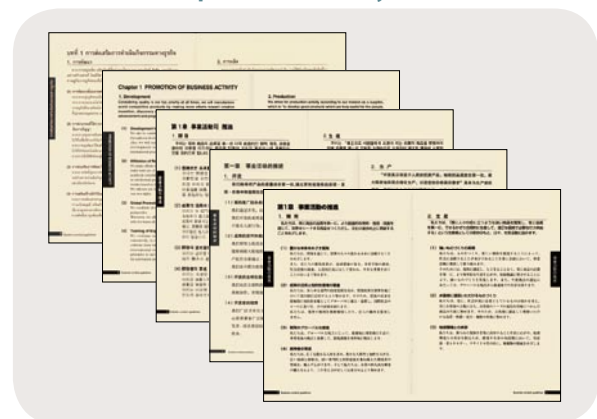
ROHM has established a compliance hotline for consultation regarding compliance violations within the ROHM Group, with the purpose to quickly understand and appropriately respond to information about violations. All employees are made aware of this through the distribution of compliance cards and company-wide bulletins. Internal regulations are established to ensure that conflicts of interest do not arise from consultation and reporting for people using this hotline, in accordance with the Whistleblower Protection Act.

■ Action principles of the ROHM Group

ROHM distributes its "Principles of Action of the ROHM Group," which clarifies the basic moral rules to be observed in everyday business activities to all officers and employees of ROHM Headquarters and its domestic affiliates. In addition, English,

Chinese, Korean, Thai, German, French, Malaysian, and Taiwanese translations have been created and distributed to all officers and employees of our overseas affiliates. Upon distribution, ROHM has all officers and employees submit a pledge to observe these principles. ROHM attempts to thoroughly promote the maintenance of internal regulations within the entire ROHM Group, including the prohibition of inappropriate internal discrimination, sexual harassment, power harassment, forced labor, child labor, insider trading, transactions with antisocial forces and bribery, and the observation of appropriate procedure for contributions which includes political contributions.

[ROHM Group Conduct Policy]



■ Internal educational activities

ROHM strives to implement internal compliance education activities, including compliance training at every level from new employees to supervisors, subsection chiefs, and department and section chiefs. The publication of these articles of compliance violations is included in the company newsletter.