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Universal Douglas

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Conflict Minerals

Universal Douglas considers the issue of Conflict Minerals to be one of concern as a source for funding organizations responsible for human rights violations. To fulfill our social responsibility in our procurement practices, Universal Douglas, in principle has adopted a policy of non-use of conflict minerals as raw materials.

Universal Douglas had taken a basic stance on conflict minerals in 2012, and reviewed it in April 2018 based on recent social trends in regard to responsible minerals procurement. In order to fulfill our corporate social responsibility, Universal Douglas promotes responsible procurement of minerals in the global supply chain.

However, at the same time, there are companies and individuals in such areas who are conducting business activities with no connection to any illegal activities. Universal Douglas is therefore mindful of our obligation to avoid using minerals that are associated with illegal or unethical behavior, while striving to ensure that legitimate companies' and individuals' business activities and livelihoods are not harmed by such efforts.

As a foundation to this position, Universal Douglas is conducting its activities continuously based on the "Due Diligence Guidance" of the OECD (Organization for Economic Co-operation and Development) and has built management processes which conform to global standards, with the aim of contributing to the international efforts being made to address these issues.

Sincerely,



VP of Product Management, Pricing, Marketing

Universal Douglas

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