

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM SD/A  
SPECIALIZED DISCLOSURE REPORT

**Kabushiki Kaisha Internet Initiative**  
(Exact Name of Registrant as Specified in Its Charter)

**Internet Initiative Japan Inc.**  
(Translation of Registrant's Name Into English)

<b>Japan</b> (State or other jurisdiction of incorporation or organization)	<b>0-30204</b> (Commission File Number)	<b>Not applicable</b> (IRS Employer Identification No.)
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<b><u>Jinbocho Mitsui Bldg., 1-105 Kanda Jinbo-cho, Chiyoda-ku, Tokyo 101-0051, Japan</u></b> (Address of principal executive offices)	<b><u>101-0051</u></b> (Zip code)
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**Akiko Hayashi, +81-3-5205-6412**  
(Name and telephone number, including area  
code, of the  
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:  
 Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2013.

**Explanatory Note**

This Amendment to the Form SD for the reporting period from January 1 to December 31, 2013, which was filed on May 28, 2014, is being filed for the sole purpose of correcting the unintentional omission of the conformed signature on the signature page by a printer.

Other than as expressly set forth above, this Form SD/A does not, and does not purport to, amend, update or restate the information in any Item of the Form SD.

## Introduction

This report has been prepared by the management of Internet Initiative Japan Inc. (herein referred to as “IIJ”, “the Company”, “the Group”, “we”, “us”, or “our”).

The Group offers a comprehensive range of Internet connectivity services, WAN services, outsourcing services, systems integration and equipment sales to our customers mainly in Japan. We believe our services are efficient and reliable and provide solutions to our customers on one of the most advanced and reliable Internet backbone networks available in Japan. Our services are based upon high-quality Internet related networking technology tailored to meet the specific needs and demands of our customers.

Telecommunication equipment sold by IIJ includes routers and LAN cables. The products are not manufactured by IIJ, but are contracted to be manufactured by IIJ. Revenues generated by the sales of telecommunication equipment comprised 1.48% of our total revenues for the fiscal year ended March 31, 2014.

### **Section 1 - Conflict Minerals Disclosure Item 1.01 Conflict Minerals Disclosure and Report**

IIJ has determined that tantalum, tin, gold and tungsten, all of which are conflict minerals, as defined in Form SD under 17 CFR 249b.400, are necessary to the functionality or production of products contracted by IIJ to be manufactured.

Accordingly, IIJ has conducted in good faith a reasonable country of origin inquiry (“RCOI”) regarding such conflict minerals that is reasonably designed to determine whether any of the conflict minerals originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country, as defined in Form SD under 17 CFR 249b.400, or are from recycled or scrap sources, as defined in Form SD under 17 CFR 249b.400. For the RCOI, IIJ conducted a supply chain survey with direct suppliers using the Electronics Industry Citizenship Coalition / Global e-Sustainability Initiative (EICC/GeSI) Conflict Minerals Reporting Template. IIJ surveyed all of its direct suppliers representing 100% of total procurement activities.

Based on its RCOI mentioned above, IIJ could not determine whether the necessary conflict minerals, i) originated in the DRC or an adjoining country or, ii) came from recycled or scrap sources. Accordingly, IIJ has exercised due diligence on the source and chain of custody of such conflict minerals that conforms to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition<sup>1</sup>, an internationally recognized due diligence framework, as defined in Form SD under 17 CFR 249b.400.

As a result of that due diligence, IJ could not determine whether its conflict minerals, i) originated in the DRC or an adjoining country, or ii) came from recycled or scrap sources. As a result, IJ has concluded that the products IJ contracts to be manufactured that contain conflict minerals are DRC conflict undeterminable, as defined in Form SD under 17 CFR 249b.400. A Conflict Minerals Report is filed as an exhibit to this specialized disclosure report and is available on IJ's Japanese website (<http://www.ij.ad.jp/ir/library/sec/index.html>) and English website (<http://www.ij.ad.jp/en/ir/library/sec/index.html>).

**Item 1.02 Exhibit**

IJ has filed, as an exhibit to this Form SD, the Conflict Minerals Report required by Item 1.01.

**Section 2 – Exhibits**  
**Item 2.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

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<sup>1</sup> OECD (2013), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition, OECD Publishing.  
<http://dx.doi.org/10.1787/9789264185050-en>

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Internet Initiative Japan Inc.

By: /s/Koichi Suzuki  
Name: Koichi Suzuki  
Title: Chief Executive Officer

May 29, 2014

**Exhibit 1.01  
Conflict Minerals Report**

**I. Introduction**

This Conflict Minerals Report for Internet Initiative Japan Inc. (“IIJ,” “we,” or “our”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”) for the reporting period from January 1 to December 31, 2013.

IIJ sells telecommunication equipment, including routers and LAN cables. The products are not manufactured by IIJ, but are contracted to be manufactured by IIJ. IIJ has determined that tantalum, tin, gold and tungsten, all of which are conflict minerals, are necessary to the functionality or production of products contracted by IIJ to be manufactured.

For the reporting period from January 1 to December 31, 2013, IIJ has conducted due diligence on the source and chain of custody of such necessary conflict minerals. However, the result of such due diligence was that we were not able to obtain adequate information from our supply chain to be able to make any determination as to the source of such conflict minerals and, therefore, we have determined that the products for which conflict minerals are necessary to the functionality or production are DRC conflict undeterminable.

**II. Due Diligence**

**A. Design of Due Diligence**

Our conflict minerals due diligence measures have been designed to conform with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition (the “OECD Guidance”), an internationally recognized due diligence framework. The OECD Guidance calls for diligence measures to (i) establish strong company management systems, (ii) identify and assess risk in the supply chain, (iii) design and implement a strategy to respond to identified risks, (iv) carry out independent third-party audit of supply chain due diligence at identified points in the supply chain, and (v) report on supply chain due diligence.

**B. Due diligence measures performed for the period January 1 to December 31, 2013**

For the reporting period from January 1 to December 31, 2013, we have implemented several measures in accordance with the OECD Guidance.

- (i) Establish strong company management systems:
  - a. We held explanatory meetings to provide our company policy on conflict minerals to our suppliers.
  - b. We assigned our Compliance Department to conduct a supply-chain survey with our direct suppliers.
  - c. We reported to the CEO, the COO, and the CFO regarding the necessity of conducting a survey of suppliers and filing a report on Form SD.
- (ii) Identify and assess risk in the supply chain:
  - a. We identified the products we contracted to be manufactured by suppliers and determined that there were five suppliers who were contracted by IJ to manufacture such products.
  - b. We distributed a survey based on the Electronics Industry Citizenship Coalition / Global e-Sustainability Initiative ("EICC/GeSI") Conflict Minerals Reporting Template to all of those suppliers to identify the smelters and refiners who may have contributed refined conflict minerals to products contracted to be manufactured by IJ and collected the results from all of them.

**C. Due diligence measures performed after December 31, 2013**

The due diligence process discussed above is an ongoing process. Since IJ contracts for products to be manufactured that are DRC conflict undeterminable, after December 31, 2013, IJ has taken or will take the following steps to mitigate the risk that its necessary conflict minerals benefit armed groups, as defined in Form SD under 17 CFR 249b.400, and to improve its due diligence.

- (i) Establish strong company management systems:
  - a. We communicated to our suppliers our company policy on conflict minerals through a letter issued by our COO.
  - b. We provided our company policy on conflict minerals on our company website both in Japanese (<http://www.ij.ad.jp/ir/faq/about/index.html>) and in English (<http://www.ij.ad.jp/en/ir/faq/about/index.html>).
  - c. We structured our internal management system so as to assign and empower the Compliance Department to exercise and support supply chain due diligence.
- (ii) Identify and assess risk in the supply chain:
  - a. We strengthened company engagement with suppliers by inquiring about the survey results.

- b. We conducted an assessment of our risk of using conflict minerals by contracting production to our suppliers. The assessment consisted of analyzing the survey results from our suppliers and checking their governance structures.
  - c. We will continue to communicate with suppliers with the goal of determining whether products contracted to be manufactured by IJJ include conflict minerals originating in DRC or an adjoining country.
- (iii) Design and implement a strategy to respond to identified risks:
- a. We reported to our Board of Directors i) the procedures and results of our RCOI, ii) the measures and results of our due diligence, and iii) the steps we have taken to mitigate the risk that our necessary conflict minerals benefit armed groups and to improve our due diligence.
  - b. We have established a company-level grievance mechanism as an early-warning risk-awareness system by providing an email address where suppliers may send messages concerning issues on conflict minerals.
- (v) Report on supply chain due diligence:
- a. Our Disclosure Committee has verified and approved the submission of Form SD and the Conflict Minerals Disclosure Report for the reporting period from January 1 to December 31, 2013 to the United States Securities and Exchange Commission (SEC).
  - b. We decided to annually conduct a supply-chain survey with direct suppliers using the EICC/GeSI Conflict Minerals Reporting Template, and have also decided to report the results to our Board of Directors before submitting Form SD and the Conflict Minerals Disclosure Report to the SEC.
  - c. We will continue to publicly report our policies and improvements on our due diligence by submitting Form SD and the Conflict Minerals Disclosure Report to the SEC.

**D. Independent Audit**

IJJ is not required to obtain an independent private sector audit of this Conflict Minerals Report for the year ended December 31, 2013 because IJJ's relevant products are identified to be DRC conflict undeterminable following the due diligence process discussed above.

**III. Product Description**

IJJ contracts for products to be manufactured that have not been found to be DRC conflict free, as defined in Form SD under 17 CFR 249b.400. The following is a description of such products:

- i. Routers
- ii. LAN Cables

We were not able to obtain sufficient information to identify the facilities used to process the necessary conflict minerals in these products or the country of origin of such necessary conflict minerals. Our efforts to determine the mine or location of origin of the conflict minerals in its products include the due diligence procedures described in Section II of this Report.