

HHPE Compliance Hotline Rules
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Article 1 (Purpose)

New whistle blowing system / Vigil Mechanism titled “**Hitachi Global Compliance Hotline**” has been implemented from 1st April, 2020. The purpose of these Rules is to set out the basic rules for the implementation and administration of a system by which officers and employees etc. (as further defined in **Article 2**) may report certain illegal or inappropriate conduct at the Company (HHPE). The goal of these Rules is to prevent such conduct and enable it to be corrected as early as possible as well as to enhance compliance with laws and regulations and the observance of high ethical standards in all business activities.

Article 2 (Qualification as a reporter)

Individuals in the following categories ("Reporters") may submit reports under these Rules.

- ① Current and former Company's officers and employees (including seconded employees (expatriates); the same shall apply hereinafter).
- ② Temporary employees working at the Company.
- ③ Officers and employees of, and temporary employees working at, business partners of the Company.

Article 3 (Contents of reports)

In connection with the business activities of the Company or its group company, a Reporter may report matters related to:

- ① the protection of the lives and health of individuals;
- ② the protection of consumers' interests;
- ③ conservation of the environment;
- ④ ensuring fair competition, including violations of the Antimonopoly Act, etc.;
- ⑤ the provision of unjustifiable benefits to public officials, etc. in Japan or a foreign country;
- ⑥ sexual harassment, power harassment and other acts of harassment; and
- ⑦ any inappropriate or unjustifiable conduct, including any violation of laws, regulations or internal rules.

Article 4 (Protection of Reporters)

1. The Company shall not subject Reporters to disadvantageous treatment for submitting reports, even if the facts reported subsequently prove to be incorrect or do not give rise to any action. Further, the Company will not allow any officer or employee to expose Reporters to disadvantageous treatment for submitting reports. However, this shall not apply where a report is found to constitute slander or

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- defamation, or to have been made in bad faith and to be baseless.
2. Submitting a report shall not automatically exempt a Reporter from liability for involvement in the illegal or inappropriate conduct that is the subject of the report. However, an exemption from, or reduction in, disciplinary action shall be considered for such a Reporter.
 3. In the event that a Reporter falls within item 3) under Article 2, the head of the Central Vigilance Committee ("Department in charge of the Report") shall require the Company’s business partners not to subject the Reporter to disadvantageous treatment for submitting a report.

Article 5 (Use of Hitachi’s internal reporting system)

The Company will use the internal reporting system managed and operated by Hitachi, Ltd. (“Hitachi”) as the Company’s sole internal reporting system.

Article 6 (Report recipient)

Reporters shall submit their reports via an external reporting service engaged by the Compliance Department of Risk Management Division of Hitachi ("Hitachi’s Compliance Department").

Article 7 (Reporting methods)

1. When submitting a report to an external reporting service engaged by Hitachi’s Compliance Department, the Reporter shall submit it over the telephone number : **844 – 545 – 1397** or using an internet portal : **hitachi.ethicspoint.com**, both designed by the external service provider engaged by Hitachi’s Compliance Department, or any other means separately designated by Hitachi’s Compliance Department.
2. A Reporter may identify himself/herself or submit their reports anonymously. However, if a report is submitted anonymously, it may not be possible to adequately investigate its contents and it will be impossible to inform the Reporter of the results of the investigation.

Article 8 (Measures to be taken after receiving reports)

1. When the Department in charge of the Report is notified by Hitachi’s Compliance Department or an external lawyer designated by Hitachi’s Compliance Department (“Designated Lawyer”) that a report concerning business of the Company is submitted, the Department in charge of the Report shall verify the contents of the report and, when it determines that there is a possibility of illegal or inappropriate conduct, shall promptly initiate an investigation of the contents of the report. Further, the notification from Hitachi’s Compliance Department set out in this item includes the notification indirectly made through the company supervising the Company.
2. The Department in charge of the Report shall notify Hitachi’s Compliance Department or the Designated Lawyer of the results of the investigation conducted pursuant to the preceding item. In the event that the

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notification set out in the preceding section was made via a company supervising the Company, the Department in charge of the Report shall notify Hitachi’s Compliance Department through such company supervising the Company.

3. In the event that the Department in charge of the Report determines that corrective action is necessary based on the results of an investigation under item 1 of this Article or a notification of the results of an investigation pursuant to the preceding item, the Department in charge of the Report shall notify the head of the relevant department of matters to be corrected and report the same to Central Vigilance Committee.
4. The central Vigilance committee will consist of representatives of senior management level. The names of Central Vigilance Committee members shall be notified separately.

Article 9 (Confidentiality of Reporter)

The Department in charge of the Report may not disclose any information that enables a Reporter to be identified to anyone other than personnel in the Department in charge of the Report, other senior personnel responsible for compliance, Hitachi’s Compliance Department personnel and personnel handling internal reporting in a company supervising the Company without the Reporter's consent.

Article 10 (Cooperation with investigations)

The Company’s officers and employees are required, to the extent permitted and / or required by applicable law, to cooperate with investigations conducted pursuant to *Article 8*.

Article 11 (Dissemination of the system)

The Department in charge of the Report shall make efforts to ensure that the system stipulated by these Rules is disseminated to ensure appropriate implementation.

Article 12 (Conflict with laws and regulations)

In the event that any provision of these Rules violates or is inconsistent with any laws or regulations of Japan / India or another applicable jurisdiction, the provisions of the laws and regulations shall prevail.

Human Resources

Effective date: 01/04/2020

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