

# Hitachi Group Whistleblowing Policy - GlobalLogic Group

## Introduction

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Hitachi, Ltd., together with its group companies, subsidiaries, and affiliates (collectively, “Hitachi”), including all GlobalLogic group companies (collectively, “GlobalLogic”) maintains a culture of openness and is committed to the highest standards of sincerity, accountability, and ethical conduct.

An essential characteristic of our open culture is the availability of appropriate channels for Hitachi employees and other stakeholders to report concerns in good faith and the ability to do so without fear of reprisal.

The [Hitachi Group Code of Ethics and Business Conduct](#) (hereafter referred to as the Code of Conduct) identifies various channels to report a concern. These channels include the GlobalLogic Hotline (hereafter referred to as the “hotline”, details of which appear below). Hitachi employees and other stakeholders can report a concern anonymously, where permitted by law, through the hotline if they wish to do so. **More details about the hotline are listed in Point 4.**

It is the responsibility of every Hitachi employee to speak up and report misconduct when they see it. Managers have a responsibility to listen to concerns and respond appropriately.

The Chief People Officer, Chief Legal Officer and Chief Financial Officer are accountable for the oversight and management of the hotline.

## 1. Scope and exclusion

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This policy applies to, and its reporting mechanisms are available to:

- all current and former Hitachi employees (whether full-time or part-time);
- those belonging or who once belonged to the administrative, management or supervisory boards of Hitachi;
- those who supply/supplied goods or services to Hitachi, including vendors, secondees, external consultants, professional service providers, contractors (extended workforce) or to those working under the supervision of such persons;
- agency personnel;
- customers executing contracts with Hitachi for the purpose of Hitachi products or services;
- those who acquire information during a recruitment process or pre-contractual discussions with Hitachi;
- shareholders of Hitachi; and
- public servants;

who are seeking to report a concern about actual or suspected misconduct by Hitachi (in the European Union (EU), such concerns will include the Relevant Concerns listed in Annex 1, and all such individuals in the EU are referred to collectively as Relevant Individuals).

This policy also applies to third persons with a connection to the persons mentioned above (such as their colleagues or relatives, persons providing them with assistance, or legal entities connected to them).

This policy does not govern employee grievances, complaints relating to job performance, or the terms and conditions of employment or the termination thereof.

If this policy indicates a requirement that is less restrictive than the local regulatory requirements or in conflict with the local law, the applicable regulatory requirement must be followed, and GlobalLogic's Chief Legal Officer shall be notified. Any deviation from this policy shall be requested in writing from GlobalLogic's Chief Legal Officer.

This policy may be amended from time to time and may be supplemented with additional local measures to account for local law or local regulatory requirements.

Other local policies and procedures at GlobalLogic that may also be relevant are:

- 1) Whistleblower Policy – EU ([link](#));
- 2) EMEA Policy and guideline for preventing harassment, discrimination, mobbing ([link](#));
- 3) Whistle Blower / Vigil Mechanism Policy applicable to GL India;
- 4) Preventing, Prohibiting and Responding to Sexual Harassment at Workplace ([link](#)) applicable to GL India.

Where there are any conflicts between this Policy and the local ones mentioned above, the local regulations prevail.

## 2. Terms and definitions

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The following terms and definitions in this policy align with International Organization for Standardization standards.

- **Shall** indicates a requirement per Hitachi policies and procedures.
- **Should** indicates a recommendation.
- **May** indicates a permissive statement and an option that is neither mandatory nor specifically recommended.

## 3. Policy requirements

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### 3.1. Reporting a concern

3.1.1. The availability of various speak-up channels within Hitachi (including Legal and the hotline) allows people to choose the channel most suitable to their circumstances. Concerns can be reported in writing or orally, including through face-to-face meetings, upon request by the reporting person, or through the hotline (telephone or online). An independent third party receives, and processes reports in a secure and confidential manner. The hotline is available 24/7 and allows a person to remain anonymous, where permitted by law. Where a person requests a face-to-face meeting, the meeting shall be arranged to take place as soon as reasonably possible.

3.1.2. While Hitachi would like employees to feel comfortable speaking up internally and allow the company the chance to deal with the issue, nothing in this policy prohibits employees from reporting possible violations of laws or regulations to any relevant government agency or entity for the concerned jurisdiction, which may be appropriate in certain circumstances.

3.1.3. Any concern reported by a person shall be taken seriously and addressed appropriately, promptly, and (as far as is possible in the circumstances) confidentially, with appropriate feedback provided to the reporting person.

### 3.2. Evaluation of concerns

3.2.1. Concerns shall be evaluated promptly and effectively to determine the appropriate course of action. Such evaluation should be completed within three business days of receiving the concern, but no later than seven calendar days.

3.2.2. Evaluation of material misconduct shall include consultation with GlobalLogic's Chief Legal Officer, Human Resources or Finance as appropriate.

3.2.3. Persons designated to receive and/or investigate concerns shall have the competency, capacity, and appropriate authority to manage and follow up on the reports. These persons shall be independent and abstain from the case if they have any conflicts of interest related to the case and report the conflict of interest according to the Conflicts of Interest provisions in the Code of Conduct.

3.2.4. Persons shall be notified of the receipt of the concern promptly and in any event within seven business days of raising it. Appropriate lines of communication shall be maintained with the reporting person, and further information may be sought from them as required.

3.2.5. GlobalLogic's Chief Legal Officer shall be notified of any material misconduct including where a concern becomes material misconduct during the investigation.

### 3.3. Protection

Hitachi has a zero tolerance policy for retaliation of any kind against persons who report concerns.

3.3.1. This policy is designed to offer protection to persons who had reasonable grounds to believe that a concern had arisen at the time of reporting.

3.3.2. Protection is available to persons reporting a concern anonymously if the conditions of this policy are met.

3.3.3. Protection shall be provided against all forms of actual, threatened or attempted retaliatory measures (in the EU, these will include the specific measures listed in **Annex 1**). Persons can also consult Legal to obtain advice on the procedures and remedies available to them, their protection against retaliation and their rights as a whistleblower.

3.3.4. Protection cannot apply to those who report information already fully available in the public domain or unsubstantiated rumors and hearsay where they do not have a reasonable belief in a possible concern.

3.3.5. Except for cases where identifying the person who reported the concern is essential to conduct the investigation, Hitachi officers/employees shall not attempt to identify the reporter and those supporting the investigation.

3.3.6. Any act of retaliation shall be treated by Hitachi as a violation of its applicable rules and policy and could result in disciplinary action up to and including dismissal.

3.3.7. Disciplinary action may be taken by the company against any employee deliberately raising false and malicious allegations or otherwise acting in bad faith.

### 3.4. Confidentiality

3.4.1. Strict confidentiality shall be applied, to the extent possible, to handling concerns, including investigation details and the identity of the person making the allegation.

3.4.2. Hitachi shall take all reasonable steps to maintain confidentiality as far as possible during and after the reporting and investigations processes to ensure that the person making the report, the reported concern, or any other persons or items mentioned in the report are not improperly disclosed to non-authorized persons.

### 3.5. Investigation

3.5.1. Hitachi is committed to following up appropriately, promptly, and (as far as is possible in the circumstances) confidentially, with appropriate feedback provided to the reporting person on concerns raised.

3.5.2. Hitachi officers/employees are required to cooperate with investigations conducted in accordance with this policy.

3.5.3. The forms of malpractice/ material misconduct which could warrant an investigation and might require formal disciplinary action (including termination of contract or dismissal in the most serious cases) include but are not limited to:

- a) Breach of Hitachi's internal policies and Hitachi Group Code of Ethics and Business Conduct
- b) Fraud or corruption, including bribery
- c) Irregularities involving accounting or other financial procedures
- d) Commission of any criminal offense
- e) Conduct which is, or may be, in conflict with Hitachi's interests, for example, inappropriate contacts with a business competitor
- f) Dishonesty or other irregularities in dealing with customers and suppliers
- g) Conduct that endangers the health and safety of the public, employees and other Hitachi workers and visitors
- h) Failure to comply with a legal obligation
- i) Environmental damage arising from Hitachi's activities or those of its employees or workers on Hitachi business
- j) Discrimination, bullying and harassment
- k) Act or omission resulting in damage or risk of harm to human rights or the environment
- l) Breach of any other legal or regulatory requirement

3.5.4. GlobalLogic's Chief People Officer, Chief Legal Officer and Chief Financial Officer shall appoint an investigator who will take responsibility for the investigation, including notifying the investigator of the confidential obligations they would be bound to.

### 3.6. Response and timescale

3.6.1. It is imperative that the person making the report is informed of the investigation progress and outcome within a reasonable timeframe -- not exceeding three months -- and as much as legally possible without breaching confidentiality to build and maintain trust in the effectiveness of the concerns management process, including whistleblower protection. In complex cases where this timeframe could be longer, the person should be informed within a reasonable timeframe and given an expected completion date for the investigation. Even where Hitachi might be constrained by confidentiality, it shall still try to provide the reporter with as much information as possible about the steps that have been taken in response to their concerns.

3.6.2. Details regarding reporting a concern via the hotline are listed at point 4 below.

## 4. Channel for reporting concerns at GlobalLogic

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Global Logic \ Hitachi hotline at: [globallogic.com/hotline](https://globallogic.com/hotline) (multiple languages are available).

### Change History

| Revision | Change Description   | Valid Date         | Approver   |
|----------|--|--------------------|--|
| 1.0      | Initial release  | September 30, 2022 | Jae Kim, Chief Legal Officer                                   |
| 1.1      | Update of GlobalLogic's headquarters address and information about new Code of Conduct | July 27, 2023      | Jae Kim, Chief Legal Officer                                   |
| 2.0      | Update of GlobalLogic's reporting channels (point 4)                                   | Nov 28, 2023       | Kamila Koszewicz-Grzeszczak, VP Global Compliance & EMEA Legal |

# Annex 1 - EU Annexure

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## *Definitions:*

- A *relevant concern* refers to possible breaches of EU law in the areas listed in Article 2(1) of Directive (EU) 2019/1937, including: (a) public procurement; (b) financial services, products and markets, and prevention of money laundering and terrorist financing; (c) product safety and compliance; (d) transport safety; (e) protection of the environment; (f) radiation protection and nuclear safety; (g) food and feed safety, animal health and welfare; (h) public health; (i) consumer protection; (j) protection of privacy and personal data, and security of network and information systems; (k) breaches affecting the financial interests of the European Union as referred to in Article 325 Treaty on the Functioning of the European Union (TFEU) and as further specified in relevant European Union measures; and (l) breaches relating to the internal market, as referred to in Article 26(2) TFEU, including breaches of European Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law.
- For the purposes of Section 3.3.3, such retaliatory measures shall include, but not be limited to, the following: (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the Relevant Individual had legitimate expectations that they would be offered permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the Relevant Individual will not, in the future, find employment in the sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a license or permit; (o) psychiatric or medical referrals.