

SEI Interconnect Products (Europe) Limited			
Human Resources Management			
Document:	Whistle-Blowing System Policy		
Revision:	02		
Issued by:	Imke Liedke	Date:	04.11.2019
Approved by:	Satoshi Konishi	Date:	04.11.2019

Whistle-Blowing System Policy

Article 1 (Purpose)

The purpose of this Policy is to stipulate elements necessary to establish a system under which SEI Interconnect Products (Europe) Ltd (“the Company”) shall engage in consultation with and receive reports from employees, etc. (all officers and employees engaged in the business of the Company, including fixed-term employees, part-time employees, dispatched employees, retired persons from those and officers and employees of transaction partners of the Company; collectively “Employees, etc.”) in connection with any actual or suspected illegal or unethical behaviour related to the Company’s business (“Compliance Issue”) and take relevant measures, thereby enabling early detection and correction of the Compliance Issue and enhancing the Company’s compliance system.

Article 2 (System for Consultation and Report of Compliance Issues)

The Company shall establish a system under which it will engage in consultation with and receive reports from Employees, etc. in connection with Compliance Issues and take relevant measures in response (“System for Consultation and Report of Compliance Issues”).

Article 3 (Point of Contact)

3.1 To ensure the effectiveness of the System for Consultation and Report of Compliance Issues, the Company shall establish a point of contact for consultation and reporting within the Company (“Internal Contact”). The Managing Director of the Company is designated as the Internal Contact. The Company shall also establish a point of contact for consultation and reporting outside the Company (“External Contact”).

For details of the External Contact, go to: <http://sei.ethicspoint.com>

3.2 The Employees, etc. may consult with and report to said points of contact stipulated under the preceding paragraph in connection with Compliance Issues.

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Article 4 (Method of Using System for Consultation and Report of Compliance Issues)

4.1 Consultation and reporting may be made by telephone, website in writing or in another manner designated by the Company separately.

4.2 In general, the Employees, etc. shall clarify their departments and names when consulting or reporting. However, if there is an appropriate reason, consultation or reporting may be made anonymously.

4.3 The Employees, etc. shall not consult or report with regard to matters irrelevant to a Compliance Issue or knowingly misrepresent the facts in a consultation or report, consult or report to realize a personal benefit, consult or report with the purpose of engaging in defamation or slander or consult or report for any other dishonest reason. This Policy shall not be applied to such consultations and reports.

Article 5 (Notification of receipt)

The Company shall provide the Employee, etc. making consultation or reporting (“Consultation and Report Maker”) with a notification of receipt in a timely manner, if the consultation and reporting are made by electronic mail, facsimile or in writing, unless there is a difficulty in notification due to anonymity of Consultation and Report Maker or for other unavoidable reasons

Article 6 (Investigations and Actions)

6.1 The Company shall consider the subject of the consultations and reports and shall conduct investigations, if necessary, in cooperation with the office of Compliance Committee of Sumitomo Electric Industries, Ltd. (“SEI”), SEI business units, etc. which supervise the Company and external professionals (collectively “Relevant Persons”) and promptly determine emergency measures and corrective measures, etc. when Compliance Issues are identified as a result of said investigations.

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6.2 The person(s) responsible for handing a consultation or report shall respond sincerely and shall endeavour to exercise due care given to the privacy of both (“Consultation and Report Maker”) and Employees, etc. suspected of participating in Compliance Issues as a result of the consultation or report.

6.3 Any person having an interest in the subject of a consultation or report shall not handle an investigation under this Article.

6.4 The Employees, etc. shall sincerely cooperate with an investigation under this Article when requested to do so and shall not interfere with the investigation.

Article 7 (Internal Treatment)

In the event that a Compliance Issue is identified as a result of an investigation under the preceding Article, the Company may take disciplinary action with regard to Employees, etc. who participated in the Compliance Issue under the employment regulations.

Article 8 (Protection of Consultation and Report Makers)

8.1 The Company shall not treat a Consultation and Report Maker unfavourably by, for example, terminating the Consultation and Report Maker, for making the consultation or report.

8.2 The Company shall take appropriate procedures to prevent the Consultation and Report Maker’s working environment from deteriorating as a result of making the consultation or report.

8.3 The Company may not use for other purposes nor disclose without a justifiable reason, confidential or personal information discovered in the course of an investigation, relevant measures and internal treatment taken, including the fact that a consultation and report was made, to any person other than the Relevant Persons.

Article 9 (Notification)

In general, the Company or the office of Compliance Committee of SEI shall notify the Consultation and Report Maker where possible of the results of the investigation and corrective measures taken under Article 6 with due care given to the privacy of the Employees, etc. suspected of participating in

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the Compliance Issue and the protection of confidential information of the Company. In general the External Contact shall notify the Consultation and Report Maker in the event of a consultation or report made to the External Contact.

Article 10 (Follow up)

The Company shall take appropriate procedures, after investigation, if it was reported by Consultation and Report Maker that he/she is being treated unfavorably as a result of making the consultation or report.

Article 11 (Miscellaneous)

The Company shall not be provided with the department or name of a Consultation and Report Maker who consults with or reports to the External Contact, if the Consultation and Report Maker wishes not to disclose such information to the Company.

Policy Validity

This policy will come into effect as of 04.11.2019

Revision History

Revision Number	Effective Date	Description of Changes
01	22 January 2015	New release
02	04 November 2019	New external contact company