

\* The Japanese version is the authoritative version, and this English translation is intended for reference purposes only. Should any discrepancies or doubts arise between the two versions, the Japanese version will prevail.

## **The University of Tokyo Detailed Rules on the Operation of the Compliance Hotline and Investigation of Compliance Irregularities etc.**

Established: The University of Tokyo Rules No. 65; March 24, 2011

### **Article 1 Purpose**

All matters concerning the operation of the Compliance Hotline (hereinafter referred to as the “Hotline”) listed in Appended Table 2 of The University of Tokyo Basic Rules on Compliance (hereinafter referred to as the “Basic Rules”) and investigation of compliance irregularities shall be governed by the Basic Rules and these detailed rules.

### **Article 2 Definitions**

The terms used in these detailed rules shall follow the definitions in the Basic Rules.

### **Article 3 Operation of the Compliance Hotline**

1. The Senior Compliance Officer establishes the Hotline both within and outside the University.
2. Addresses and means of reporting to the Hotline shall be made known widely to the members etc. of the University in an appropriate manner.
3. The Senior Compliance Officer is responsible for the Hotline.
4. The Hotline shall have a Hotline Manager; and the Manager of the Legal Affairs Group, General Affairs Department in the Administration Bureau shall serve in this capacity.
5. Staff appointed by the Hotline Manager shall be responsible for responding to questions such as those concerning the operation of the reports through the Hotline and the process for protecting the reporters.
6. Concerning the Hotline, persons in charge of handling whistleblowing specified as obligatory in the Whistleblower Protection Act are those listed below.
  - (1) The Senior Compliance Officer
  - (2) The Hotline Manager
  - (3) Those among Staff of Legal Affairs Group who are in charge of communication and coordination concerning the reports of compliance.

- (4) Other persons who engage in handling the reports through the Hotline and are given information specifying the reporters etc. through his/her business.
7. The Senior Compliance Officer shall notify those listed in (2) – (4) of the preceding article that he/she is an obligatory person in charge of handling whistleblowing.
8. The Senior Compliance Officer and the Hotline Manager shall endeavor to closely cooperate with the hotlines dealing with specific compliance irregularities listed in Appended Table 2 of the Basic Rules (hereinafter referred to as “designated hotlines”).

#### **Article 4 Acceptance of a report**

1. Reports to the Hotline shall be, in principle, done in writing, by e-mail or in a way the Senior Compliance Officer specifies with the reporter’s name and contact information being clearly stated. However, this shall not preclude an anonymous report clarifying that the reporter is one of those listed in Article 12 of the Basic Rules.
2. The Hotline Manager shall, at the time of accepting reports, clearly indicate that the utmost care will be taken so that the reporter’s information such as his/her name will not be disclosed to persons other than those engaged in an investigation.
3. When a report is made in a way such that the reporter cannot know whether the report has been received or not, the Hotline Manager shall notify the reporter of its receipt.
4. The Hotline Manager shall promptly notify the Senior Compliance Officer of a report being made through the Hotline.

#### **Article 5 Transfer of a report**

The Senior Compliance Officer may, when he/she finds the report appropriate to be dealt with at a designated hotline, transfer the case to the Executive Vice President who has jurisdiction over the said designated hotline after confirming the intention of its reporter and consultation with the said Executive Vice President.

#### **Article 6 Preliminary Investigation**

1. The Senior Compliance Officer shall, when he/she receives the report set forth in Paragraph 4 of Article 4, examine the necessity of investigating the facts of the report prescribed in Article 17 of the Basic Rules with fairness and integrity.
2. The Senior Compliance Officer may conduct a preliminary investigation of the facts of the report as necessary to perform the examination in the preceding paragraph.

3. When conducting a preliminary investigation in the preceding paragraph, the Senior Compliance Officer may request the Compliance Officers of relevant academic organizations for cooperation, and examine the documents concerning the report.
4. The Senior Compliance Officer shall endeavor to notify the reporter whether or not a preliminary investigation will be conducted within 20 days after the report to the Hotline.

#### **Article 7 Request for Response**

1. When the Senior Compliance Officer finds, as the result of the examination in Paragraph 1 of the preceding article or the preliminary investigation, that an investigation in Article 17 of the Basic Rules is not necessary, he/she may request as necessary the Compliance Officer of the relevant academic organization or the Executive Vice President etc. for a response as corrective measures concerning the report.

#### **Article 8 Investigation Procedures**

1. When the Senior Compliance Officer finds, as the result of examination or the preliminary investigation specified in Article 6, that the reported case is a compliance irregularity and that an investigation specified in Article 17 of the Basic Rules is necessary, he/she shall request the Compliance Officer or an Executive Vice President etc. to conduct an investigation or conduct the investigation himself/herself.
2. When the Senior Compliance Officer, the Executive Vice President etc. or the Compliance Officer conduct an investigation concerning the compliance irregularity, he/she may, as necessary, establish an investigation commission, or ask relevant persons to submit necessary materials, or give their explanations or opinions.
3. When the investigation ends, the Senior Compliance Officer shall notify the reporter and the subject of the report of the investigation result (facts found by the investigation and corrective actions).

#### **Article 9 Reinvestigation Procedures**

1. The reporter and the subject of the report may appeal to the Senior Compliance Officer for a reinvestigation within 20 days in principle after the notice in Paragraph 4 of Article 6 or Paragraph 3 in the preceding article.
2. The Senior Compliance Officer shall, when he/she receives the appeal in the preceding paragraph, examine the necessity of the reinvestigation with fairness and

integrity, and notify the reporter the subject of the report whether or not the reinvestigation will be conducted.

3. All procedure concerning the reinvestigation shall follow examples of procedure of the investigation of the compliance irregularity.

#### **Article 10 Confidentiality Obligation**

1. Persons who handle reports shall not reveal secrets obtained in the course of duties. The same shall apply even after they have resigned from office.

#### **Article 11 Exclusion of relevant persons**

1. Persons who handle the procedures prescribed in these detailed rules shall not handle a case involving themselves.
2. When the Senior Compliance Officer become the subject of a report to the Hotline, the President may as necessary have someone appropriate take over the business of the Senior Compliance Officer prescribed in the Basic Rules and these detailed rules.
3. When the Compliance Officer become the subject of a report to the Hotline, the Senior Compliance Officer may as necessary have someone appropriate take over the business of the Compliance Officer prescribed in the Basic Rules and these detailed rules.
4. When the Hotline Manager become the subject of a report to the Hotline, the Senior Compliance Officer may as necessary have someone appropriate take over the business of the Hotline Manager prescribed in these detailed rules.

#### **Supplementary Provisions**

1. These detailed rules shall come into force on March 24, 2011.
2. The University of Tokyo Rules on Whistleblower Protection (established on March 25, 2008) shall be abolished.

#### **Supplementary Provisions**

These detailed rules shall come into force on June 1, 2022.