

\* 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**

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

### **Article 1 Purpose**

The purpose of these detailed rules is to specify the necessary matters regarding the operation of the Compliance Hotline pursuant to the provision of paragraph 1 of Article 11 of the University of Tokyo Basic Rules on Compliance (hereinafter referred to as the “Basic Rules”) and thereby to promote an appropriate response to compliance irregularities specified in the Basic Rules and to contribute to the protection of whistleblowers at the National University Corporation, the University of Tokyo (hereinafter referred to as the “University”) based on the Whistleblower Protection Act (Act No. 122 of 2004).

### **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. Reports to the Compliance Hotline shall be handled both within and outside the University.
2. Addresses and means of reporting to the Compliance Hotline shall be made known widely to academic and administrative staff, students, and other members of the University in an appropriate manner.
3. The Senior Compliance Officer is responsible for the Compliance Hotline.
4. The Compliance Hotline shall have a Hotline Manager; and the Legal Affairs Group Manager shall serve in this capacity.
5. 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 the “designated hotlines”).

6. The Legal Affairs Group shall be responsible for responding to questions such as those concerning the hotline process.

#### **Article 4 Persons eligible to use the Compliance Hotline**

Academic and administrative staff, students, and other members of the University shall be eligible to use the Compliance Hotline.

#### **Article 5 Acceptance of a report**

1. Reports to the Compliance Hotline shall be, in principle, done in writing or by e-mail with the reporter's name and contact information.
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 report compliance irregularities which have come through the Compliance Hotline (hereinafter referred to as the "reported case") to the Senior Compliance Officer.

#### **Article 6 Transfer of a case**

The Senior Compliance Officer may, when he/she finds the reported case 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 7 Investigation**

1. The Senior Compliance Officer shall, when he/she receives the report set forth in paragraph 4 of Article 5, examine the necessity of the investigation prescribed in Article 14 of the Basic Rules with fairness and integrity, and notify the reporter as to whether or not the investigation will be conducted.
2. The Senior Compliance Officer may establish an investigation commission as necessary and ask relevant persons to submit necessary materials or to give their explanations or opinions.
3. The Senior Compliance Officer shall notify the reporter of the result of the investigation pertaining to the reported case.

### **Article 8 Protection of reporters and cooperators**

1. Academic and administrative staff, students, and other members of the University shall not disadvantage reporters and persons who cooperate with an investigation on the grounds that they report or cooperate with an investigation pertaining to the reported case.
2. Reporters and persons who cooperate with an investigation may, when they are treated in a manner which violates the preceding paragraph, appeal to the Senior Compliance Officer.
3. The Senior Compliance Officer shall, when he/she verifies the contents of the appeal prescribed in the preceding paragraph, take appropriate measures for redress.

### **Article 9 Consideration for subjects of reports, etc**

The Senior Compliance Officer shall give consideration to subjects of reports and persons who cooperate with an investigation based on the provision of Article 16 of the Basic Rules, and take necessary measures to restore the honor of the relevant persons through such means as the publication of the facts when there turns out to be no fact pertaining to the report and the Senior Compliance Officer finds that the honor of the subject person has been harmed.

### **Article 10 Confidentiality Obligation**

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**

Persons who handle reports shall not handle a case involving themselves.

### **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.