

\* 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 Basic Rules on Compliance**

March 24, 2011

Board Resolution

The University of Tokyo Rules No.64

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### **Chapter 1 General Provisions**

#### **Article 1 Purpose**

The purpose of these rules is to establish the basic matters concerning compliance at the University of Tokyo (hereinafter referred to as the “University”) and to contribute to the protection of whistleblowers based on the Whistleblower Protection Act (Act No. 122 of 2004) and thereby to contribute to the maintenance of a sound and proper management of the University and public confidence in the University.

#### **Article 2 Definitions**

In these rules, the meanings of the terms listed in the following items shall be as prescribed respectively in those items:

- (1) “Compliance” means observance of laws, the University rules and regulations, and other norms such as ethics inherent in education and research.

- (2) “Executive” means any one of the executive staff members listed in Section 1 of Chapter 2 of the University of Tokyo Rules on Basic Organizations (Rule No. 1 of 2004.4.1; hereinafter referred to as the “Rules on Organizations”).
- (3) “Academic and administrative staff” means members listed in Section 2 of Chapter 2 of the Rules on Organizations and any other temporary staff.
- (4) “Students” means those who are allowed to enter the University, to take courses, and to audit classes based on the University rules and regulations.
- (5) “Members of the University” means executives, academic and administrative staff and students.
- (6) “Those equivalent to members of the University” means anyone other than the members of the University who participate or engage in management or activities of education and research of the University.
- (7) “Members etc. of the University” means members of the University and those equivalent to members of the University.
- (8) “Academic organization” means the university-wide organizations and university academic organizations listed in Chapters 3 and 4 of the Rules on Organizations, the Secondary School attached to the Faculty of Education, and the University of Tokyo Hospital.
- (9) A “compliance irregularity” means a case in which members of the University violate or are suspected of violating laws or the University rules and regulations, or a case in which those equivalent to members of the University, while participating or engaging in management or activities of education and research of the University, violate or are suspected of violating laws or the University rules and regulations, with reference to management or activities.

### **Article 3 Responsibilities of members of the University**

Members of the University shall maintain awareness of their own responsibilities, fully recognize the importance of compliance, respect human rights, and act with high ethical standards in order to achieve the goals and principles of the Charter of the University of Tokyo.

## **Chapter 2 Structure for the Promotion of Compliance**

### **Article 4 Chief Compliance Officer**

The President shall be ultimately responsible for the implementation of compliance procedures within the University.

#### **Article 5 Senior Compliance Officer**

1. The University shall have a Senior Compliance Officer in order to have him/her supervise operations concerning compliance.
2. The Senior Compliance Officer shall supervise the Executive Vice Presidents in dealing with compliance irregularities.
3. An Executive Vice President designated by the President shall serve as the Senior Compliance Officer.

#### **Article 6 Compliance Officer**

1. Each academic organization shall have the Compliance Officer specified in Appended Table 1 in order to have him/her supervise the promotion of compliance at each academic organization.
2. The Executive Vice President shall supervise the execution of the duties by the Compliance Officer set forth in the preceding paragraph pertaining to compliance irregularities under the Executive Vice President's jurisdiction.

#### **Article 7 Compliance Oversight Committee**

1. The Compliance Oversight Committee (hereinafter referred to as the "Compliance Committee") shall be established in the University.
2. The Compliance Committee shall conduct comprehensive deliberations concerning overall verification and plans for prevention of compliance irregularities, and deliver its opinion concerning appropriate measures (including internal audit) to the President as necessary.
3. The Compliance Committee shall consist of the Senior Compliance Officer, Executive Vice Presidents, and others appointed by the Senior Compliance Officer.
4. The Senior Compliance Officer shall serve as Chairperson of the Compliance Committee.
5. In addition to what is provided for in the preceding paragraph, matters necessary for the operation of the Compliance Committee shall be specified separately.

#### **Article 8 Compliance Oversight Office**

1. The Compliance Oversight Office (hereinafter referred to as the "Compliance Office") shall be established under the Compliance Committee.
2. The Compliance Office shall plan and coordinate the operation of the Compliance Committee and supervise practical operations of the investigation conducted by the

Senior Compliance Officer set forth in Paragraph 1 of Article 17.

### **Chapter 3 Prevention of Compliance Irregularities**

#### **Article 9 Education and Training**

1. The Senior Compliance Officer shall endeavor to establish a university-wide education and training system for members of the University to raise their awareness of the importance of compliance and increase understanding of the laws and rules to be complied with.
2. The Senior Compliance Officer shall grasp the situation regarding education and training pertaining to compliance and take measures such as providing the Compliance Officers with the necessary instructions in order to perform his/her duty set forth in the preceding paragraph.

#### **Article 10 Internal Audits**

1. The President shall conduct internal audits concerning compliance irregularities of a specific academic organization or the whole University as necessary.
2. Based on the result of internal audits set forth in the preceding paragraph, the Senior Compliance Officer and the Compliance Officers shall endeavor to enhance activities for the prevention of compliance irregularities.

### **Chapter 4 Reporting Compliance Irregularities**

#### **Article 11 Reporting**

1. On becoming aware of compliance irregularities, academic and administrative staff shall report the matter promptly to their superior or to the Compliance Officer.
2. On becoming aware of compliance irregularities, students shall endeavor to report the matter promptly to academic and administrative staff of the academic organization to which they belong.
3. The academic and administrative staff who receives the report set forth in the preceding two paragraphs shall report the compliance irregularity promptly to the Compliance Officer.
4. The Compliance Officer who receives the report set forth in the preceding paragraph shall report such compliance irregularities as he/she finds important promptly to the Executive Vice President or the Vice President (hereinafter referred to as the "Executive Vice President etc.") who has jurisdiction over the said matter.

5. The Executive Vice President etc. who receives the report set forth in the preceding paragraph or becomes aware of compliance irregularities for her/himself shall report such compliance irregularities as he/she finds important promptly to the Senior Compliance Officer.
6. In the cases set forth in Paragraph 1 and 2, when there is a justifiable reason for not making a report, the hotlines specified in the next article or helplines specified in Article 14 may be used instead of making a report.

## **Chapter 5 Reporting Compliance Irregularities through the Hotlines and Helplines**

### **Article 12 Reporting through the Hotlines**

1. On becoming aware of compliance irregularities, those listed below may report through the hotlines specified in Appended Table 2.
  - (1) Members etc. of the University
  - (2) Those who were academic and administrative staff within one year prior to the date of reporting

### **Article 13 Provision of Information**

The provision of the preceding article shall not preclude anyone other than those set forth in the preceding article from using the hotlines specified in Appended Table 2 in order to provide information on compliance irregularities.

### **Article 14 Complaint through the Helplines**

1. Complaints about harassment and other matters over which the helplines specified in Appended Table 3 have jurisdiction are governed by The University of Tokyo Rules on the Harassment Prevention Committee or other rules provided separately.

### **Article 15 Cooperation between Hotlines and Helplines**

1. The hotlines specified in Appended Table 2 and the helplines specified in Appended Table 3 (hereinafter referred to as “the hotlines”) shall endeavor to properly cooperate each other for the promotion of compliance.
2. When the Executive Vice President etc. who have jurisdiction over the hotlines receives the report or complaint, he/she shall report such compliance irregularities as he/she finds important to the Senior Compliance Officer.

### **Article 16 Responsibilities of the Reporters**

A person who makes a report, or reports through the hotline or makes a complaint through the helplines about a compliance irregularity (hereinafter referred to as a “report etc.”, and the person who makes a report etc. as a “reporter”) shall do so based on objective and reasonable grounds and shall not do so with a purpose of defamation or any other wrongful purpose.

## **Chapter 6 Investigating Compliance Irregularities**

### **Article 17 Investigation Procedures concerning the Members etc. of the University**

1. The Senior Compliance Officer who receives the report set forth in Paragraph 5 of Article 11 or Paragraph 2 of Article 15 pertaining to the members etc. of the University (excluding students) shall request the Compliance Officer or an Executive Vice President etc. who have jurisdiction over the matter to conduct an investigation of the facts concerning the compliance irregularities as deemed necessary. However, this shall not preclude the Senior Compliance Officer from conducting the investigation himself/herself such as establishing a new commission under his/her direct control.
2. When carrying out the investigation set forth in the preceding paragraph, the Compliance Officer, Executive Vice President etc. or the Senior Compliance Officer shall endeavor to ensure objectivity and fairness in the investigation, such as the participation of an external specialist as deemed necessary.
3. The Compliance Officer or the Executive Vice President etc. shall report the result of the investigation set forth in Paragraph 1 to the Senior Compliance Officer.
4. Academic and administrative staff shall cooperate sincerely with the investigation set forth in Paragraph 1 when so requested.
5. The Senior Compliance Officer shall take appropriate action such as reporting the facts of compliance irregularities and measures for preventing a recurrence to the President based on the result of the investigation set forth in Paragraph 1.
6. The Senior Compliance Officer shall, when he/she deems it necessary based on the result of the investigation set forth in Paragraph 1, report to the President about subjecting the compliance irregularities to disciplinary proceedings upon consulting with the Executive Vice President in charge of the disciplinary actions.
7. Other management of the hotlines and investigation procedures carried by the Compliance Officer or Executive Vice President etc. are governed by the foundation rules of the hotlines.

### **Article 18 Investigation Procedures concerning Students**

1. Compliance irregularities pertaining to students shall be investigated appropriately with educational consideration on the responsibility of the head of the academic organization to which the students belong, and educational guidance shall be provided based on the result of the investigation as necessary.
2. The head of the academic organization shall, when he/she deems there is an act that may warrant a disciplinary action based on the result of the investigation set forth in the preceding paragraph, take appropriate actions such as notifying the President of his/her opinion based on the University of Tokyo Regulations on Disciplinary Action against Students.

### **Article 19 Prohibition of Disadvantageous Treatment**

1. Members etc. of the University shall not give any disadvantageous treatment to the reporters or persons who cooperate with an investigation pertaining to the reported compliance irregularity (hereinafter referred to as “reporters etc.”) on the basis of the report or cooperation.
2. Reporters etc. may, when they consider they are given treatment which violates the preceding paragraph, appeal to the Senior Compliance Officer for redress.
3. The Senior Compliance Officer, Executive Vice President etc. and the Compliance Officers shall take the necessary measures so that sufficient consideration is given to the provision concerning Paragraph 1 as much as possible, and when they verify the contents of the appeal prescribed in the preceding paragraph, take appropriate measures for redress as much as possible.

### **Article 20 Consideration on the Subjects**

1. Members etc. of the University shall not unduly violate the honor and privacy of the person who is subject of the report or investigation (hereinafter referred to as the “subjects”).
2. The Senior Compliance Officer, Executive Vice President etc. and the Compliance Officers shall take necessary measures so that sufficient consideration is given to the provision concerning Paragraph 1 as much as possible, and take necessary measures to restore the honor of the subjects such as the publication of the facts as much as possible when there turns out to be no fact pertaining to the report and they find that the honor of the subjects has been harmed.

## **Article 21 Confidentiality Obligation**

1. Members of the University shall not reveal secrets about the compliance irregularity they obtain such as information specifying the reporters etc. without justifiable grounds. The same shall apply even after they are no longer members of the University.
2. Members of the University shall take the necessary measures to prevent those equivalent to members of the University from revealing secrets about the compliance irregularity they obtain such as information specifying the reporters etc. without justifiable grounds.
3. Members etc. of the University shall not intend to specify the reporters etc. without justifiable grounds.
4. The Senior Compliance Officer, Executive Vice President etc. and the Compliance Officers shall take the necessary measures so that sufficient consideration is given to the provision concerning the preceding three paragraphs as much as possible and take proper measures for redress as much as possible when they find a fact which violates the preceding three paragraphs.

## **Article 22 Measures taken by the President**

The President shall, when receiving the report or notification set forth in Paragraphs 5 and 6 of Article 17 or Paragraph 2 of Article 18, suspend the illegal acts, etc. or restore to a lawful state as necessary, and take necessary measures such as the prevention of recurrence and disciplinary action.

## **Article 23 Accountability**

1. A compliance irregularity shall be reported to related agencies appropriately and be disclosed to the public in an appropriate time and manner as necessary, taking the social impact of the said matter into consideration.
2. The Senior Compliance Officer shall announce the operation results of the hotlines specified in Appended Table 2 in the University as appropriate for the proper execution of business.

## **Chapter 7 Miscellaneous Provisions**

### **Article 24 Miscellaneous Provisions**

In addition to what is provided for in these rules, necessary matters concerning the implementation of these rules shall be provided separately.



**Supplementary Provisions**

These rules shall come into force on March 24, 2011

**Supplementary Provisions**

These rules shall come into force on April 1, 2011

**Supplementary Provisions**

These rules shall come into force on July 1, 2011

**Supplementary Provisions**

These rules shall come into force on July 26, 2011

**Supplementary Provisions**

These rules shall come into force on October 1, 2011

**Supplementary Provisions**

These rules shall come into force on April 1, 2012

**Supplementary Provisions**

These rules shall come into force on July 1, 2012

**Supplementary Provisions**

These rules shall come into force on February 21, 2013

**Supplementary Provisions**

These rules shall come into force on April 1, 2013

**Supplementary Provisions**

These rules shall come into force on July 1, 2013

**Supplementary Provisions**

These rules shall come into force on July 25, 2013

**Supplementary Provisions**

These rules shall come into force on April 1, 2014

**Supplementary Provisions**

These rules shall come into force on July 1, 2014

**Supplementary Provisions**

These rules shall come into force on September 2, 2014

**Supplementary Provisions**

These rules shall come into force on April 1, 2015

**Supplementary Provisions**

These rules shall come into force on March 1, 2016

**Supplementary Provisions**

These rules shall come into force on April 1, 2016

**Supplementary Provisions**

These rules shall come into force on April 18, 2016

**Supplementary Provisions**

These rules shall come into force on May 19, 2016

**Supplementary Provisions**

These rules shall come into force on July 1, 2016

**Supplementary Provisions**

These rules shall come into force on October 1, 2016

**Supplementary Provisions**

These rules shall come into force on December 1, 2016

**Supplementary Provisions**

These rules shall come into force on February 1, 2017

**Supplementary Provisions**

These rules shall come into force on February 1, 2017

**Supplementary Provisions**

These rules shall come into force on April 1, 2017

**Supplementary Provisions**

These rules shall come into force on May 1, 2017

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**Supplementary Provisions**

These rules shall come into force on October 1, 2017

**Supplementary Provisions**

These rules shall come into force on November 1, 2017

**Supplementary Provisions**

These rules shall come into force on January 1, 2018

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These rules shall come into force on February 1, 2019

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These rules shall come into force on April 1, 2019

**Supplementary Provisions**

These rules shall come into force on May 1, 2019

**Supplementary Provisions**

These rules shall come into force on October 1, 2019

**Supplementary Provisions**

These rules shall come into force on December 1, 2019

**Supplementary Provisions**

These rules shall come into force on February 1, 2020

**Supplementary Provisions**

These rules shall come into force on April 1, 2020

**Supplementary Provisions**

These rules shall come into force on December 1, 2020

**Supplementary Provisions**

These rules shall come into force on February 1, 2021

**Supplementary Provisions**

These rules shall come into force on April 1, 2021

**Supplementary Provisions**

These rules shall come into force on July 1, 2021

**Supplementary Provisions**

These rules shall come into force on December 1, 2021

**Supplementary Provisions**

These rules shall come into force on April 1, 2022

**Supplementary Provisions**

These rules shall come into force on June 1, 2022

**Supplementary Provisions**

These rules shall come into force on July 1, 2022

**Supplementary Provisions**

These rules shall come into force on October 18, 2022

**Supplementary Provisions**

These rules shall come into force on November 1, 2022

**Supplementary Provisions**

These rules shall come into force on April 1, 2023

Appended Table 1

Appended Table 2

Hotlines
Compliance Hotline
Research Funds Hotline
Committee on Standards of Conduct in Scientific Research
Information Ethics Hotline

Appended Table 3

Helplines
Harassment Prevention Committee
Grievance Committee
Disability Discrimination Case Resolution Committee