

NISSIN FOODS Group Compliance Regulations (excerpt)

Chapter 3. Responses to Compliance Violations

Article 12. Reports, Whistleblowing, and Consultations by Employees etc.

1. If an Employee etc. commits a compliance violation, engages in conduct suspected of being a compliance violation (referred to as a “Compliance Violation”) or learns that another Employee etc. committed a Compliance Violation, such Employee etc. shall immediately take either of the following actions.
 - (1) Report to the direct supervisor of the Employee etc. or the compliance manager of the department with which the Employee etc. is affiliated (referred to as the “Employee’s Department”) or the subsidiary where the Employee etc. works (referred to as the “Employee’s Subsidiary”); or
 - (2) Report to a whistleblowing hotline specified in the NISSIN FOODS Group Internal Reporting Regulations.
2. An Employee etc. may make a report specified in the preceding paragraph by telephone, email, in writing, in person, or other means.

Article 13. Responses to Reports from Employees etc.

1. If a report of a Compliance Violation is received from an Employee etc. pursuant to the preceding article, the response shall be as specified below.
 - (1) The compliance manager or whistleblowing contact point staff member who receives a report pursuant to the preceding paragraph shall immediately report to the Committee Secretariat and report to the CO of the Employee’s Department or the president of the Employee’s Subsidiary.
2. If the Committee Secretariat receives a report from a compliance manager or whistleblower hotline, it shall take the following actions.
 - (1) Upon receipt of a report, the Committee Secretariat shall report to the Committee Administrative Manager and Committee Chairman as appropriate according to the particulars of the report and shall make a request for investigation to the compliance manager of the relevant department, the HR Division, and the Internal Auditing Office.
 - (2) If, as a result of the investigation specified in the preceding paragraph, the Committee Secretariat Director determines that the matter regarding which a report was received constitutes a Compliance Violation, the Committee Secretariat Director and the Committee Administrative Manager shall coordinate with the relevant CO or subsidiary President and investigate a response policy.
 - (3) The Committee Administrative Manager shall determine the response policy investigated pursuant to the preceding paragraph and report to the Committee Chairman as appropriate. In the case of matters determined by the Committee Administrative Manager to be significant, a request for determination of the response policy shall be made to the Committee Chairman.
 - (4) Responsive measures to the Compliance Violation shall be made pursuant to the decision specified in Paragraph (3).
 - (5) The Committee Secretariat shall periodically report to the Committee on the details of responses undertaken pursuant to Paragraph (4).
 - (6) If a Compliance Violation is identified taking into account a reported matter, the Committee shall investigate the suitability of existing internal regulations and systems depending on the severity of the violation and shall undertake corrective measures and measures to prevent reoccurrence including training and education planning and implementation.

Article 14. Responses to Compliance Violations

In the case of a Compliance Violation committed by Employees etc. determined pursuant to the preceding article to be the result of intentional misconduct or gross negligence, disciplinary action against those involved in the Compliance Violation shall be investigated in accordance with employment regulations and so on.