

### **KOBELCO Whistleblower System**

Introducing Kobelco's Complementary Whistleblower System.

This system is an addition to our existing whistleblower scheme from 2016, which has been adjusted on 01/03/2022.

This supplement was set up by Kobe Steel, Ltd. and Kobelco Europe GmbH, managed by NAVEX Global UK Ltd. and thus should introduce alternative remedies to enforce compliance on issues such as those in Article 1, paragraph 1c up to and including paragraph 1d, further to be insured.

#### **Details of the system**

Start Date	01/03/2022
administrator	NAVEX Global UK Ltd
KOBELCO Whistleblower system link	<a href="https://secure.ethicspoint.eu/domain/media/en/gui/107029/index.html">https://secure.ethicspoint.eu/domain/media/en/gui/107029/index.html</a>

#### **(NOTE)**

- ✓ Notifications can be sent via the above website link. You have the option to report by phone or internet.
- ✓ In accordance with Article 12, paragraph 1, in principle you must receive a written confirmation with substantive information from the highest management or internal supervisory body within 8 weeks.
- ✓ If this term is not feasible, you will be informed of this in writing, in accordance with Article 12, paragraph 2
- ✓ Employees of Kobelco Welding of Europe can be assisted by our confidential adviser. The information is on the board in the hall.
- ✓ **The administrator will not disclose or use your personal information such as your name, phone number or do not disclose your email address without your permission.**

### **Reports about abuses and violations of EU law**

This concerns not only suspected abuses that are in the public interest that can be reported, but also possible infringements of EU law. Infringement of EU law is an act or omission that concerns the following areas of EU law:

- Public procurement;
- Financial services, products and markets, money laundering prevention and counterterrorism;
- Product safety and product conformity;
- Transport safety;
- Protection of the environment;
- Radiation protection and nuclear safety;
- Safety and food and feed, animal health and animal welfare;
- Public health;
- Consumer Protection;
- Protection of personal data.

**Types of problems that can be reported according to Article 1, paragraphs 1c to 1d include the suspicion of:**

- Embezzlement/misappropriations or malversation;
- Bribery;
- Anti-competitive behavior, including bid manipulation or price matching with competitors;
- Fraudulent Accounting;
- Financial crimes such as money laundering or insider trading with non-public information;
- Monitoring misconduct in a company due to insufficient audit;
- Any conduct, or intentional oversight thereof, that leads to a disruption in Company-supplied products;
- Failure to comply with required laws and regulations;
- Falsification of quality assurance information/data, or disclosure thereof;
- Leakage of trade secrets;
- Falsification of material information related to the management and operations of the company or its business activities;
- Improper use of information;
- Organizational neglect of human rights violations;
- Other violations of laws/regulations, internal rules or contracts related to the Company's business.

if you have any questions about this whistleblowing system, please contact John Wijnands +31(0)6-218 46 404
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