

# Mitsui Components Europe Ltd

## Whistleblowing Policy

The aim of this procedure is to encourage you to raise any genuine concerns you might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

### Eligibility

This procedure applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for us personally. It does not apply to genuinely self-employed workers who run a profession or business on their own account.

### Scope

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure. This procedure is for making a disclosure of wrongdoing or malpractice where you reasonably think that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, you should seek advice from the Senior Manager HR & GA.

### Types of wrongdoing addressed by this procedure

If you genuinely believe that we, or any of our workers, has taken, is intending to take or has failed to take action that you reasonably believe could lead or amount to:

- a criminal offence including bribery;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above

you should disclose this information verbally or in writing to the Senior Manager HR & GA. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

Any concerns covered by this procedure should be raised with the company to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

### Investigating allegations of wrongdoing

If you disclose information in accordance with this procedure, wherever reasonably practicable we will keep your identity confidential.

We will investigate your allegation promptly. During the course of our investigation we may require your assistance. We discourage anonymous disclosures as they are likely to hinder effective investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat information about the investigation as confidential.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Managing Director.

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.

### **Action we may take**

No action will be taken against anyone who raises a genuine concern in accordance with this procedure.

We may take appropriate action against any person found to be:

- victimising another person for using this procedure (please tell the Senior Manager HR & GA if you think you have been victimised, or raise it formally under the grievance procedure if the matter is not remedied);
- deterring any person from reporting genuine concerns under this procedure (please tell Senior Manager HR & GA if you think you have been deterred, and raise it formally under the grievance procedure if the matter is not remedied), or

For employees this action may involve us taking disciplinary action, which may result in dismissal.

We may also take disciplinary action against a person who does not act in accordance with this procedure.

### **Status of this procedure**

This procedure does not give contractual rights to individual employees, workers or contractors. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.