

**School Juridical Person International Christian University
Regulations Governing Whistleblowing**

(Purpose)

Article 1. The purpose of these regulations is to promote early detection and rectification of acts in violation of laws and ordinances, etc. by establishing a framework in which whistleblowing is properly responded to concerning the operations of the School Juridical Person International Christian University (hereinafter referred to as the “juridical person”) based on the Whistleblower Protection Act (Act No. 122 of June, 2004), thus contributing to the sound development of the juridical person.

(Definitions)

Article 2. In these regulations, the terms set forth in the following items shall be as defined in the respective items:

- (1) The term “act in violation of laws and ordinances, etc.” refers to an act that violates laws and ordinances, etc. committed by the juridical person as well as its staff, etc. and officers; and the term “reportable act” refers to an act in violation of laws and ordinances, etc. or an act that is likely to violate laws and ordinances, etc.
- (2) The term “staff, etc.” refers to persons that fall under any of the following:
 - (a) full-time staff, part-time staff, *shokutaku* staff, part-time lecturers, etc., and substitute teachers of the juridical person
 - (b) temporary worker who is dispatched to the juridical person and works under the directions and orders of the juridical person (hereinafter referred to as a “dispatched worker”)
 - (c) worker who engages in their duties at the juridical person based on a subcontracting agreement, etc. with the juridical person (hereinafter referred to as a “contract worker”)
- (3) The term “reporting” refers to disclosing a reportable act; and the term “consultation(s)” refers to receiving necessary advice prior to or related to the reporting.
- (4) The term “internal reporting” refers to reporting that falls under whistleblowing prescribed in Article 3, item (1) and Article 6, item (1) of the Whistleblower Protection Act.
- (5) The term “external reporting” refers to reporting that falls under whistleblowing that satisfies the requirements for receiving protection prescribed in Article 3, items (2) and (3), and Article 6, items (2) and (3) of the Whistleblower Protection Act.
- (6) The term “handling of whistleblowing” refers to receiving internal reporting, investigating the subject case pertaining to the relevant internal reporting, and taking necessary measures for its rectification.
- (7) The term “reporting desk” refers to the internal point of contact for receiving reporting and providing consultation.
- (8) The term “person(s) in charge of the reporting desk” refers to the persons who receive the

reporting or provide consultation at the reporting desk.

- (9) The term “eligible user(s)” refers to persons who are eligible to use the reporting desk.
- (10) The term “reporting desk user” refers to the eligible user that has reported to or consulted with the reporting desk.
- (11) The term “subject case” refers to the reportable act that has been reported to or consulted at the reporting desk.
- (12) The term “persons in charge of investigation” refers to the persons who conduct the investigation concerning the subject case.
- (13) The term “persons cooperating with investigation” refers to the persons who cooperated in the investigation concerning the subject case.
- (14) The term “corrective measures, etc.” refers to both corrective measures and measures for preventing recurrence.
- (15) The term “dispositions, etc.” refers to not only the disciplinary action prescribed in the Rules of Employment of the juridical person, but also any and all measures the juridical person may take including guidance and warnings made orally.
- (16) The term “engaged person(s)” refers to persons engaged in the handling of whistleblowing who are provided information that can identify the reporting desk user.
- (17) The term “disadvantageous treatment” refers to any and all disadvantageous treatments including, but not limited to, dismissal, disciplinary action, demotion, salary cut, unfair reassignment/secondment/transfer, encouragement to retire, denial of contract renewal, claim for compensation of damages, de facto harassment, and unfair treatment in retirement allowance, etc.
- (18) The term “reporting line in the organizational structure” refers to a supervisor (not limited to the immediate supervisor) of each staff, etc. and officer.

(Developing the Internal Reporting System)

Article 3. A system to appropriately respond to reporting shall be developed within the juridical person, over which the Chair of the Board of Trustees shall preside.

- 2. The Managing Trustee for General Affairs shall report to the Chair of the Board of Trustees on the status of operations pertaining to these regulations.
- 3. The Chair of the Board of Trustees shall periodically perform assessments and inspections, etc. in an objective and fair manner on the development and operation status, etc. concerning these regulations, as well as implement improvements as necessary.

(Reporting Desk and Eligible Users)

Article 4. The Director of the Auditor’s Office and the Managing Trustee for General Affairs shall serve as the persons in charge of the reporting desk.

- 2. The persons prescribed in the preceding paragraph shall be designated as engaged persons pursuant to the provisions of these regulations. The juridical person shall inform these engaged persons in a way that clearly indicates that they will be in the positions of engaged persons.
- 3. Eligible users shall be staff, etc. (including those who were staff, etc. within one year of the date

of reporting) and officers.

4. Eligible users may use the reporting desk without identifying themselves.
5. Eligible users may also use the reporting desk to consult upon matters concerning the internal reporting system, disadvantageous treatment, and other such matters.

(Method of Reporting or Consultation)

Article 5. The reporting desk shall be contacted in writing or by e-mail; provided, however, that even when other means of communication are used for a reporting or consultation, it may be handled as having used the reporting desk.

2. Reporting and consultation requests shall be made, in principle, by disclosing one's name; provided, however, that when the reporting desk deems that there are unavoidable circumstances, anonymous reporting or consultation may be accepted.

(Acceptance of Reporting or Consultation)

Article 6. When a reporting or consultation request is made, the person(s) in charge of the reporting desk shall, upon confirming the details, accept the reporting or consultation.

2. The person(s) in charge of the reporting desk may, when they deem it necessary that the identification, etc. of the reporting desk user be verified, request the reporting desk user to present documents, etc. to verify their position or identification. In this case, when the reporting desk user is a dispatched worker or a contract worker, inquiries may be made to the dispatching agency or the entity with which the juridical person has contracted for outsourcing services to verify the identity of the person in question.
3. The person(s) in charge of the reporting desk may, when they deem it necessary to confirm further details of the facts concerning the content of the reporting, etc., confirm details in writing, by e-mail, phone, interview, etc. with the reporting desk user or request for documents to be presented or submitted, etc.

(Investigation)

Article 7. The investigation on the subject case reported to the reporting desk shall be conducted by the Managing Trustee for General Affairs; provided, however, that when the Managing Trustee for General Affairs deems it necessary for conducting sufficient investigation concerning the subject case, the Managing Trustee for General Affairs may also have other persons conduct the investigation.

2. When the Managing Trustee for General Affairs is to provide information that can identify the reporting desk user to the other persons in charge of investigation, they must be designated as engaged persons. The juridical person shall inform these engaged persons in a way that clearly indicates that they will be in the positions of engaged persons.
3. When it is deemed necessary for the investigation, opinions or cooperation may be sought from specialists, etc. external to the juridical person.
4. The persons in charge of investigation shall, depending on the case, promptly report the results of the investigation to either the Chair of the Board of Trustees, President, or Head of High School.

(Corrective Measures, Dispositions, Etc.)

Article 8. As a result of the investigation, if it becomes clear that an act in violation of laws and ordinances, etc. has occurred, depending on the case, either the Chair of the Board of Trustees, President, or Head of High School must promptly take corrective measures, etc.

2. When the Managing Trustee for General Affairs is to provide information that can identify the reporting desk user to the person who takes corrective measures, etc., they must be designated as an engaged person. The juridical person shall inform this engaged person in a way that clearly indicates that they will be in the position of an engaged person.
3. The Chair of the Board of Trustees, President, or Head of High School shall verify whether the corrective measures, etc. for the act in violation of laws and ordinances, etc. are functioning appropriately, and if it is found that the measures are not functioning appropriately, additional corrective measures, etc. shall be implemented.
4. As a result of the investigation, if it becomes clear that an act in violation of laws and ordinances, etc. has occurred, dispositions, etc. must be rendered to the person(s) involved in such act, and the matter must be reported to appropriate organizations depending on the case.

(Notification, Etc.)

Article 9. When the reporting desk has accepted a reporting or consultation, the person(s) in charge of the reporting desk must promptly notify the reporting desk user that their reporting or consultation has been accepted, and also endeavor to notify the reporting desk user about the response policies following the acceptance.

2. The person(s) in charge of the reporting desk must promptly notify the reporting desk user of the investigation results and corrective measures, etc. concerning the subject case.
3. The person(s) in charge of the reporting desk must, after the investigation on the subject case is completed, confirm with the reporting desk user whether or not they have received any disadvantageous treatment.
4. Notwithstanding the preceding paragraph, such notification is not required when the contact information of the reporting desk user is not available or the reporting desk user does not request a notification.

(Management of Information Including Prevention of Sharing Information Beyond Authorized Persons)

Article 10. The persons in charge of the reporting desk shall not share information that can identify the reporting desk user with persons other than the persons in charge of the reporting desk; provided, however, that this shall not apply to cases where the reporting desk user had explicitly given prior consent or there are other justifiable grounds.

2. The persons in charge of investigation shall not share information that can identify the persons cooperating with investigation with other persons in charge of investigation or persons in charge of the reporting desk beyond the minimum required extent; provided, however, that this shall not apply to cases where the persons cooperating with investigation had explicitly given prior consent or there are other justifiable grounds.

3. The information acquired through the investigation on a subject case (excluding the information prescribed in paragraphs 1 and 2) shall only be shared with the persons in charge of the reporting desk, persons in charge of investigation, persons involved in considering the corrective measures, etc., as well as the members and administrative office of the Board of Trustees.
4. The responses to reporting and consultations received at the reporting desk must be recorded and managed in accordance with the provisions of the School Juridical Person, Regulations Governing Document Management.

(Protection of the Reporting Desk User, Etc.)

- Article 11. Staff, etc. and officers must not impose disadvantageous treatment on the reporting desk user or persons cooperating with investigation on the grounds that they have reported to or consulted with the reporting desk, or cooperated with the investigation.
2. Staff, etc. and officers must not seek to reveal the identity of the reporting desk user or persons cooperating with investigation.

(Confidentiality)

- Article 12. Staff, etc. and officers must not disclose information concerning the subject case, nor use the information for other purposes than intended; provided, however, that this shall not be the case when there are justifiable grounds based on laws and ordinances, etc. beyond what is provided for in these regulations.

(Avoiding Conflict of Interests)

- Article 13. When staff, etc. or officers are involved in a subject case, they may not engage in the handling of whistleblowing for that particular case.
2. When the Managing Trustee for General Affairs is involved in a subject case, the duties pertaining to the reporting desk shall be handed over to the Director of the Auditor's Office, and duties pertaining to investigation and other roles prescribed in these regulations that the Managing Trustee for General Affairs assumes shall be handed over to the Director of the University Secretariat for that particular case.

(Prohibition of Reporting or Consultation with a Wrongful Purpose, Etc.)

- Article 14. Staff, etc. and officers must not engage in false reporting or consultations, reporting or consultations for the purpose of slandering or defaming other persons, or for any other wrongful purposes.

(Application Mutatis Mutandis)

- Article 15. Reporting and consultation requests made to the reporting line in the organizational structure shall be handled in the equivalent manner as internal reports, to which Articles 10 through 14 shall apply mutatis mutandis.
2. For persons who have made an external reporting, Articles 10 through 14 shall apply mutatis mutandis.

(Acts in Violation of These Regulations)

Article 16. When violation of these regulations become clear, the person(s) who conducted such violation must be rendered appropriate dispositions, etc.

2. For damages caused by the violation prescribed in the preceding paragraph, appropriate measures for relief and/or restoration must be taken.

(Dissemination of Information/Training)

Article 17. The Managing Trustee for General Affairs shall, after giving due consideration to the protection of personal information, etc., inform the staff, etc. and officers of the operational performance of the reporting desk.

2. The Managing Trustee for General Affairs shall disseminate information and offer training on the internal reporting system to staff, etc. and officers.

(Application of Individual Regulations)

Article 18. Notwithstanding the provisions of these regulations, when other applicable individual regulations, etc. are provided for concerning the reported fact, necessary measures shall be taken in accordance with the provisions of those regulations.

(Administrative Matters)

Article 19. The General Affairs Group of the General Affairs Division shall handle the administrative matters pertaining to the operation of these regulations.

(Revision and Abolition)

Article 20. Revision or abolition of these rules shall be conducted by the Board of Trustees.

Supplementary Provisions:

These rules shall come into effect as of June 1, 2022.