

Hitachi Construction Machinery (UK) Whistleblowing Policy

Scope

About this policy

We aim to develop a culture of openness. All employees working for Hitachi Construction Machinery UK Ltd and other individuals supplying services are required to assist the Company in tackling fraud, corruption, and other malpractice within the organisation by raising their concerns as outlined below.

This policy is intended to conform to the provisions of the Public Interest Disclosure Act 1998 (PIDA) should you make a protected disclosure concerning malpractice within the Company. This policy is not referred to in and does not form part of any employee's contract of employment. The Company reserves the right to amend this policy from time to time. Employees are often in a good position to identify concerns regarding malpractice within the company. However, they may not express their concerns because they are fearful of repercussions and/or that speaking up would be disloyal to their colleagues or the company. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice. This policy is intended to encourage and enable employees to raise serious concerns within the organisation rather than overlooking the problem or 'blowing the whistle' outside.

Who this Policy applies to?

This policy applies to all employees and suppliers/business partners acting on behalf of Hitachi Construction Machinery UK Ltd (namely HCMUK/the Company). In this policy, reference to "employee" includes reference to any employees, consultants, temporary/agency staff, volunteers, associated person or anyone acting on behalf of HCMUK. References to "you" and "your" in this Policy refer to employees of HCMUK and references to "we", "us" or "our" refer to HCMUK/the Company itself.

Responsibility

This policy is implemented and managed by the Human Resources (HR) department, all queries regarding this policy should be sent to humanresources@hitachicm.co.uk. You should familiarise yourself with this policy.



Definitions

What is Whistleblowing?

The term 'whistleblowing' in this policy refers to the disclosure, by employees or external stakeholders, of malpractice as well as illegal acts or omission at work.

Procedure

Policy

Malpractice is taken very seriously and the company is committed to the highest possible standards of openness, probity and accountability. In line with that commitment employees who have serious concerns about any aspect of the company's work are encouraged and expected to come forward and voice those concerns, and may do so without fear of victimisation, subsequent discrimination or disadvantage.

Examples of malpractice include (but are not limited to): fraud or corruption, irregularities involving accounting or other financial procedures, commission of any criminal offence, conflict of interest, dishonesty or other irregularities in dealing with customers and suppliers, conduct which endangers the health and safety of other, environmental damage and failure to comply with a legal obligation.

In raising a malpractice concern, you may assume that normally only those Company staff involved in investigating your concern(s) will know your identity. However, there may be circumstances in which we may be required to reveal your identity to others (on a strictly "need to know" basis) in order to progress our investigation or take further action as a consequence of the result of such investigation.

If this is the case, we will take reasonable steps to ensure that you suffer no detriment from such disclosure. (Note: should you choose to raise a concern on an anonymous basis, it may be difficult for the Company to fully investigate your concerns and will prevent us from reporting back to you on our investigation.)

If you raise a malpractice concern you will be taken seriously and the Company will take all reasonable steps to ensure you are treated fairly and justly and, in particular, are not victimised or harassed as a result of your concerns.

No Retaliation

In support of our shared responsibility to speak up, the Company has a zero-tolerance policy on retaliation. All employees who use our whistleblowing procedure or cooperate in investigations are protected under the compliance whistleblowing system regulations.

As part of the Company's commitment to tackling malpractice and encouraging employees to voice their concerns, it should be recognised that anyone who victimises or harasses or deters or attempts to deter you from raising genuine concerns under this policy may be subject to disciplinary action by the Company.

How Should You Raise Malpractice Concerns

You are encouraged to speak up if you have any genuine concerns of whatever type, provided that any concerns or complaints that you raise are made in good faith. Be sure to keep in mind that grievances relating to working conditions and other human resources issues may not be covered by the whistleblowing system. Disciplinary action will be taken against any employee deliberately raising false and malicious allegations.

Employees should contact their immediate Manager, Head of Department in good faith in order to raise their concerns. Other individuals supplying services to the Company should contact their nominated company contact.

If the concern involves your immediate manager or Head of Department / Director or nominated company contact, or for any reason you would prefer them not to be told, you may raise the issue directly with the Whistleblowing Monitoring Team, whistleblowing@hitachicm.co.uk.

We encourage you to put your concerns in writing and include as much detail as possible. You are encouraged not to disclose your concerns outside the Company unless you have first given the Company the chance to deal with the problem in accordance with this policy.

HCM Whistleblowing Systems

In support of this, HCM Group has two whistleblowing systems in place: a compliance hotline and a global alert line. These systems aim to improve corporate self-regulation by identifying and addressing compliance violations at an early stage and to foster a greater awareness of compliance.

Compliance Hotline

E-mail: chl@hitachi-kenki.com
Address: Compliance Promotion Center, Legal Dept, Hitachi Construction Machinery Co., Ltd, 2-16-1 Higashi Ueno Taito-ku, Tokyo 110-0015
Telephone: +81(0)3-5826-8170
Telephone: 0800 102 6560 United Kingdom (multilingual service available 24 hours a day, 365 days a year)

What Are The Likely Next Steps

We will ensure that a full investigation takes place with the objective of establishing whether malpractice has occurred. In relevant circumstances, the Whistleblowing Monitoring Team may delegate tasks and responsibilities to specific independent Company managers and/or the Human Resources team to assist in conducting the investigation.

As part of the investigatory process, it may be necessary for an appointed member of senior management (or those individuals nominated) to meet with you. The purpose of any such meeting will be to obtain further details of your concern and gain a better understanding of the relevant background facts supporting your concern.

You may be accompanied at any such investigatory (fact finding) meeting(s) by a colleague of your choice. (This does not extend to accompaniment by a legal representative). You may confer with your companion during the course of the meeting and he/she may address the meeting but may not answer questions on your behalf.

Grievance Procedure

The Company has established a Grievance Procedure to enable employees to raise concerns about their own working life and working conditions. This Procedure should generally be used if you are an employee and your concerns do not relate to actual or suspected malpractice of the nature outlined above.

Communication and Policy Awareness

All employees are expected to be aware of this Policy. Continuous training will be provided on this policy and on the risks which present themselves to the business;

- All employees joining the company will receive training on this policy as part of their induction programme.
- All employees currently employed by the company will receive annual training and/or communications;
- New suppliers will receive a communication with regards to our stance on malpractice from the outset of our business relationship.

Andrew Shield
Chief Finance Officer



David Roberts
Chief Executive Officer



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