

SUMITOMO ELECTRIC GROUP - EMEA

WHISTLEBLOWING ("SPEAK-UP") POLICY

Prepared by SEFL Ethics and Compliance Team for the SEG EMEA Group of companies.

Version 1.0

1. INTRODUCTION TO THIS POLICY

Sumitomo Electric Industries, Ltd. (“SEI”) and all its affiliated companies (together, the Sumitomo Electric Group, (“SEG”) are committed to conducting business in an honest and ethical manner, whilst maintaining the highest standards of transparency and accountability in all their business operations including those of the Company.

SEG recognizes that a key aspect of transparency and accountability is a mechanism which allows SEG to report and address concerns of any Misconduct (as defined below) within our group. This whistleblowing policy (“Policy”) allows anyone who knows, or suspects Misconduct within SEG EMEA activities to report their concerns in an effective, confidential, and safe manner. Anyone who makes a report will be protected from any retaliation, as long as their report has been made in good faith.

This Policy has been endorsed by Compliance and Risk Management Office of SEI and the management of SEI Interconnect Products (Europe) Ltd. (“SEPE”).

2. ABOUT THIS POLICY

This Policy explains how you can raise concerns about suspected misconduct within SEG EMEA, in confidence and without fear of retaliation. This Policy applies to whistleblowing reports made by any individual who becomes aware of any actual or suspected Misconduct within SEG EMEA and includes employees, former employees, etc.

3. WHAT CONCERNS ARE COVERED BY THIS WHISTLEBLOWING POLICY?

This Policy explains how to report concerns about suspected misconduct within SEG, ie. conduct that is in breach of the SEG Code of Conduct, of SEG policies, or of international, or local laws of the EMEA region (“Misconduct”).

The following are some examples of Misconduct that may be reported using this Whistleblowing Policy:

- misuse of company assets
- bribery and corruption
- fraud, embezzlement
- falsification of documents/records
- anti-trust and competition offences
- human rights abuses
- serious human resources matter that may be in breach the SEG Code of Conduct, or local laws
- discrimination and harassment
- breaches of information security
- breach of confidentiality
- breach of environmental standards
- health and safety concerns
- conflicts of interest
- any or other breach of any legal, or ethical obligation.

This Policy is NOT designed to deal with the following:

- urgent, or life-threatening situations such as dawn raids, or emergencies;
- any grievance relating to the terms of your employment;
- as a mechanism to settle personal differences or disputes;
- as a mechanism to deal with legal disputes;
- Information security and data breaches (unless they have not been addressed by the Company).

4. WILL I BE PROTECTED IF I SPEAK UP AND MAKE A WHISTLEBLOWING REPORT?

Consistent with the [SEG Code of Conduct](#), SEG will not tolerate any retaliation against anyone who made a whistleblowing report in good faith. SEG will take all reasonable steps to provide protection for

whistleblowers. It is important that any whistleblower who anticipates, or suffers, retaliation for submitting their report, informs the SEFL Ethics and Compliance Team as soon as possible. Any employee who retaliates against whistleblowers may be subject to disciplinary action up to and including termination of employment.

5. HOW SHOULD I REPORT MY CONCERNS?

SEG wants to create open and transparent “speak up” culture and you have several channels through which you can report your concerns.

Internal Reporting:

If you are considering making a whistleblowing report, you are encouraged to first report your concerns internally (ie. within SEG) because SEG has strict non-retaliation policy. You can report your concerns internally in three ways:

- a) either by speaking directly to their **local management**, a member of your local **Human Resources team** or **your Compliance Liaison**;
- b) Using the **Whistleblowing Hotline**, either by accessing the [online form](#) or one of the local phone numbers applicable to your country of work and in your local language; or
- c) By contacting the **SEFL Ethics and Compliance Team** compliance@emea.sei.legal.

When you submit your whistleblowing report, please provide as much information as possible - eg. where, when, what, who, and how you came to know about it.

External Reporting:

A. Report to the competent authority

A whistleblower may claim protection under this Policy when making a Report to local competent authority in cases where:

- a) the whistleblower does not receive any feedback from the SEG company, or from the SEFL Ethics and Compliance Team within 3 months of their (internal) report.
- b) following feedback, the whistleblower reasonably believes that incorrect actions have been taken.
- c) the whistleblower has reasonable grounds to believe: (i) their concern cannot be addressed effectively internally, (ii) there is risk of retaliation, or (iii) there is immediate risk of serious harm/damage to employees, stakeholders, or other third parties.

B. Public disclosure

A whistleblower may also claim protection under this Policy when making a public disclosure (a report to a third-party such as the media, public officials/parliamentarians, or any other non-designated company such as a Non-Governmental Organisation) in cases where either:

- a) no action has been taken or follow up received after submitting an internal report and/or an external report; or
- b) the whistleblower reasonably considers that
 - (i) there is an imminent or clear danger to the public interest; or
 - (ii) the relevant competent authority does not take sufficient measures or is involved in the breach.

Whistleblowers who are contemplating making a public disclosure are strongly advised to first seek guidance from legal professionals. If you do not follow the correct procedure, you could lose your whistleblower protections.

6. DO WHISTLEBLOWING REPORTS REMAIN CONFIDENTIAL?

Whistleblowing reports are kept confidential. This means that your report will only be shared with a limited group of individuals who are directly involved in the assessment, investigation, or follow-up of the report. Information will only be shared on a strictly confidential and need-to know basis.

If you chose to discuss your report with your colleague or anyone else, it is harder to maintain confidentiality.

7. CAN I SUBMIT MY CONCERNS ANONYMOUSLY?

We encourage anyone who is considering making a whistleblowing report to provide their name and contact details, where possible. This ensures that we can keep you updated on the progress of our investigation, and ask for further information, if we need it.

However, if you wish to submit a whistleblowing report anonymously (ie. without revealing your identity), you can do so using the Whistleblowing Hotline (online or via the local phone number). Your anonymity will be preserved by SEG, to the extent permitted by local laws. In the very limited cases where local laws prevent, or limit SEG's ability to investigate your anonymous report, you will be notified, and where possible, SEG will try to assist in other ways, whilst always trying to prevent any retaliation against you.

8. WHAT HAPPENS AFTER I SUBMIT MY REPORT?

Once you submit your report, you can expect to:

- (i) **acknowledgement:** you will receive this within seven (7) calendar days of making the report.
- (ii) **investigators:** you be informed of the identity of the person(s) who will lead the investigation into your report, or the relevant point of contact.
- (iii) **follow up:** be contacted to request further information or clarifications (if necessary).
- (iv) **feedback:** generally be provided with feedback within three (3) months of the report but some investigations may take longer. Where possible, we will update you on the progress of any investigation. Nevertheless, please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all parties concerned.

9. SEG INVESTIGATION PRINCIPLES

All investigations into whistleblowing reports will be managed independently, fairly, and impartially by the SEFL Ethics and Compliance Team, in accordance with this Policy, and with applicable laws, in particular respecting: the presumption of innocence; right to due process; trust, respect, and dignity for all; and protection of personal data.

This Policy does not limit anyone involved in a whistleblowing report from accessing their own independent legal advice.

The SEFL Ethics and Compliance Team will maintain a log of all whistleblowing reports, tracking their receipt, investigation, and resolution, and such other records deemed reasonably necessary and consistent with applicable law.

10. WILL THERE BE ANY CONSEQUENCE IF MY SUSPICIONS TURN OUT TO BE WRONG?

SEG is committed to an open and transparent environment, where ethical behaviour is expected from everyone. SEG encourages anyone with concerns about suspected misconduct at SEG to submit a whistleblowing report. Anyone who submits a whistleblowing report in good faith, even if it is based on honest mistake or factual errors, will be protected under this Policy. SEG does not tolerate any form of retaliation against you for Speaking Up.

11. WHAT HAPPENS IF THIS POLICY IS MISUSED?

Whistleblowers so who act in bad faith i.e., those who submit reports that are malicious, vexatious, or raise concerns that the reporter knows to be untrue, are not protected in the same way as whistleblowers who make reports in good faith. Any employees who make reports in bad faith may be subject to disciplinary procedures.

12. WHERE CAN I GO FOR FURTHER INFORMATION?

- Your line manager;
- local Human Resources team;
- your Compliance Liaison; or
- the SEFL Ethics and Compliance Team by email compliance@emea.sei.legal;

The SEFL Ethics and Compliance Team has day to day oversight of this Policy. Should you wish to discuss it, have questions or concerns relating to this Policy, or would like to provide feedback on its improvement, please contact compliance@emea.sei.legal.

Annex 1: Summary of the Whistleblowing Procedure

