

HITACHI ENERGY BULGARIA



RULES

For internal reporting for breaches and subsequent activities of the reporting

effective as of 04.05.2023

I. Subject

1.1 These rules govern the terms and conditions for internal whistleblowing and whistleblower follow-up at Hitachi Energy Bulgaria EOOD (HEBG) in accordance with the provisions of the Whistleblower Protection or Whistleblower Public Disclosure Act (WPPDA), effective 04.05.2023.

II. Objective

2.1 The purpose of these Rules is to ensure that HEBG will comply with the requirements of WPPDA and Directive (Eu) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

III. Application

3.1 The Internal Rules shall be applied with regard to concerns for violations of Bulgarian legislation or acts of the European Union, in accordance with the functions and powers of Hitachi Energy Bulgaria Ltd. in the following areas:

1. Public procurement.
2. Financial services, products and markets and the prevention of money laundering and terrorist financing.
3. Product safety and compliance.
4. Environmental protection.
5. Radiation protection and nuclear safety.
6. Food and feed safety, animal health and welfare.
7. Public health and consumer protection.
8. Protection of privacy and personal data.
9. Security of networks and information systems.
10. Fraud and any other illegal activity affecting the financial interests of the European Union within the meaning of Article 325 of the Treaty on the Functioning of the European Union.
11. An offence of a general nature of which the whistleblower has become aware in connection with the performance of his or her work or in the course of his or her duties.
12. The rules for the payment of outstanding public state and municipal claims.
13. Labour legislation;

IV. To whom protection shall be granted – so called whistleblowers.

4.1. Whistleblower is a person, who submit a report or publicly discloses information for which he/she has become aware in the capacity of:

1. The employees of Hitachi Energy Bulgaria EOOD when the information has become known to them in the course of or in connection with the performance of their work or official duties;
2. Persons working under the supervision and direction of contractors, subcontractors and suppliers of Hitachi Energy Bulgaria EOOD;
3. A person who works without an employment relationship and/or exercises a freelance profession and/or craft activity;
4. A volunteer or trainee at Hitachi Energy Bulgaria EOOD;
5. Partner, shareholder, sole owner of the capital, member of the management or controlling body of a commercial company, member of the audit committee of a company.
6. A job applicant who participated in a recruitment process for employment with Hitachi Energy Bulgaria EOOD and who has received information of misconduct in that capacity.
7. An employee of Hitachi Energy Bulgaria EOOD where the information was obtained in the course of employment or service;
relationship which has been terminated at the time of submission of the signal;
8. Any other person who reports a violation of which he/she has knowledge in a work context.

* "Work context" means current or past work activities in the public or private sector through who, regardless of their nature, individuals receive information about wrongdoing and within which those individuals may be subject to retaliation if they report such information.

4.2. With these Internal Rules is ensured that the identity of the whistleblower shall not be disclosed to anyone other than the responsible person under 5.8 without that person's express written consent.

4.3. This shall also apply to any other information from which the identity of the whistleblower could be directly or indirectly revealed.

4.4. The identity of the whistleblower and any other information from which the identity of the whistleblower may be known, directly or indirectly, may be disclosed only for the purposes of investigations by national authorities or judicial proceedings, including with a view to ensuring the right of defence of the person concerned.

IV. To whom protection shall be granted – so called whistleblowers.
continuation

4.5. Personal data which are manifestly irrelevant to the examination of a specific report shall not be collected and, if collected incidentally, shall be deleted.

V. Conditions for the protection of persons

5.1. Whistleblowers are entitled to protection by application of the minimal measures under art. 33 of WPPDA these Rules provided that they are simultaneously:

(a) They had reasonable grounds to believe that the Whistleblowing Information was true at the time it was submitted, and such information falls within the material scope.

b) they have made a report in accordance with the Rules and in the manner set out in the Rules.

5.2. Where these conditions are met, the person reporting the violations to institutions, bodies, offices, or agencies of the European Union shall also be entitled to protection.

5.3 Where a person is found to have knowingly made a report or made public false information, he/she may be liable to an administrative sanction.

5.4. Under these Rules no proceedings shall be instituted under these Internal Rules for the consideration of an application:

1. an anonymous reporting.
2. a report relating to a violation committed more than two years ago.

5.5. For faster prevention of violations or remedy the consequences of such violation, the report should be submitted as a matter of priority through the internal channel.

5.6. Hitachi Energy Bulgaria EOOD provides information on the terms and conditions for submitting internal signals on its website, as well as in prominent places in its offices and work premises.

5.7. The internal whistleblowing channel regulated in these Rules shall:

1. be managed in a manner that ensures the completeness, integrity and confidentiality of the information and prevents unauthorised persons from accessing it information.
2. allow for the storage of information recorded on a durable medium for the purposes of the whistleblowing investigation and further investigations.

V. Conditions for the protection of persons continuation

5.8. The Management of Hitachi Energy Bulgaria EOOD will designate the responsible employees in the company who will handle the internal channel reports for violations. The responsible persons have the duty to maintain up-to-date information on the website of HEBG in accordance with Article 12(4) of the WPPDA, and to post it in printed form in the workplaces so that it is accessible to all employees and provides information on how to report, namely:



Via mail: <mailto:bg-bg-ethics@hitachienergy.com>



via post and to the address: 5400 Sevlievo, 32 Nikola Petkov Str. and 1463 Sofia, 89B Vitosha Blvd. with a note Strictly Confidential to the attention of the legal counsel.



Via mobile 0884837714 and 0888537793

5.9. The employee responsible for the handling of a specific internal report should not be in a situation of conflict of interest for the report he/she is handling. The employee should make a reasoned written withdrawal from the handling of the signal/case immediately after becoming aware of the existence of a conflict of interest

VI. Procedure of processing signals

6.1. Each submitted report shall be registered by the Responsible Person in a form approved by the Commission for Protection of Data Privacy (CPDP) - Attachment No. 1 to these Rules which shall contain at least the following data:

1. the full name, address, and telephone number of the sender, as well as an e-mail address, if available e-mail address,
2. the name of the person against whom the report is made and his/her place of work, if the report is lodged against specific persons and they are known.
3. specific details of the violation or of a real risk of violation the place and period of the violation, if any, a description of the act or the situation and other circumstances if any known to the reporting person.
4. the date on which the report was given.
5. signature, electronic signature, or other identification of the whistleblower.

A written report shall be made by the sender by completing a form Attachment No. 1.

VI. Procedure of processing signals continuation

An oral report shall be documented by the completion of a form by the responsible person forhandling the signal, who shall invite the person giving the report to sign it at his/her request.

The report may be accompanied by any source of information, supporting the allegations made in it and/or reference to documents, including reference to persons who could corroborate the information reported or provide additional information.

6.2. The responsible person shall sign a declaration of confidentiality and a declaration of no conflict of interest for each case examined.

6.3. The responsible person is required to generate a Unique Identification Number (UIN) in the system of the national external whistleblowing authority (CPDP) to be used for the purposes of registering whistleblowing reports submitted to or related to Hitachi Energy Bulgaria EOOD.

6.4. The responsible person is obliged to submit the necessary statistical information to the national external whistleblowing body - CPDP in accordance with the procedure established by the latter.

6.5. Within 7 days of receipt of the signal, the responsible person referred to in p. 5.8 shall carry out a regularity check and acknowledge receipt of the report by providing the whistleblower with information on the UIN and date of registration of the signal.

6.6. If the report does not comply with the requirements of Article 15, paragraph 2 of the WPPDA, a notice shall be sent to the reporting person to remove the irregularities within 7 days of receipt of the signal.

6.7. If the deficiencies in the report are not 6.7. remedied within the 7-day period, the responsible person referred to in p. 5.8 shall return the report to the signaling person together with its annexes.

6.8. Each report shall be verified by the responsible person defined in p. 5.8. as to its admissibility and veracity. If the verification reveals that the report does not fall within the scope of the WPPDA and its content does not warrant it being considered credible, a non-compliance report shall be prepared and filed.

6.9. Signals that contain false or misleading statements of fact shall be returned with instructions to the sender to correct the statements and to inform the sender of the liability for misrepresentation.

6.10. In the event that the report is to be examined, a report shall be drawn up stating: the subject of the examination, the period examined, the time at which the examination is to be carried out with an indication of the final date, and the time limit for submitting the report.

VI. Procedure of processing signals continuation

In the event that the facts stated in the report are confirmed, the responsible person referred to in point 5.8:

- (a) arrange for follow-up action to be taken in relation to the signal, for which purpose he/she may request the assistance of other persons or units within the company.
- (b) prepare and submit a case report containing information on the signal, the follow-up action taken and proposals for specific measures to be taken to stop or prevent the infringement.
- (c) attach, as written annexes to the report, the evidence gathered in the course of the inspection.
- d)) terminates the inspection:
 - where the reported violation is a minor case and does not require further follow-up action; the termination does not affect any other obligations or applicable procedures relating to the reported violation or the protections under WPPDA with respect to internal or external whistleblowing.
 - a repeated report that does not contain new information relevant to the violation in respect of which an investigation has already been completed, unless new legal or factual circumstances warrant further action.
 - where evidence of a criminal offence has been established; the report and the accompanying material shall be sent immediately to the public prosecutor's office.

Within a period of no more than three months after acknowledging receipt of the signal, the responsible person referred to in Article 2 shall prepare a summary report briefly describing the information contained in the report, the action taken, the final results of the verification, which, together with the reasons, shall be communicated in writing to the sender and to the person concerned, subject to the obligation to protect them.

All actions of the responsible person referred to in point 5.8 in the course of the work on the report shall be documented.

The handling of multiple reports of more serious infringements shall be prioritized where the infringement has had, or is likely to have, a significant and lasting negative impact on the public interest.

Access to information relating to whistleblowing and the protection of the identity of whistleblowers shall be granted only to those staff who need the information to carry out their duties.

VII. Register of signals

7.1. Hitachi Energy Bulgaria EOOD shall create and maintain a register of signals of violations /according to the approved CPDP form, representing Attachment No. 2 to these Rules/, which is not public.

7.2. The register shall contain information on:

1. the person who received the report.
2. the date of submission of the report.
3. the person concerned, if such information is contained in the report.
4. summary details of the alleged violation, such as the place and period of the violation, a description of the act and other circumstances in which it was committed and the nature of the offence; and
5. the relationship of the report to other reports once it has been established in the process the processing of the report.
6. the information that has been provided as feedback to the person who made the report and the date on which it was provided.
7. the follow-up action taken.
8. the results of the verification of the signal.
9. the period during which the report has been stored.

7.3. The information entered in the register shall be kept in a manner that ensures its confidentiality and security.

7.4. The employees responsible for the examination of signals shall regularly submit the necessary statistical information to the national external reporting body /CPDP/ in accordance with the procedure established by it.

FINAL PROVISIONS

§ 1. These Internal Rules are approved by the management of Hitachi Energy Bulgaria EOOD on the basis of Article 13 of the Whistleblower Protection and Public Disclosure Act (WPIPDA) and are in force on the effective date of the WPPDA – 04.05.2023.

§ 2. These Internal Rules do not supersede the rules of the acting global corporate policy (PGR-LI-19 - Whistleblower Policy) providing for the powers of different authorities of Hitachi Energy to carry out investigations, including such for integrity violations and compliance with the Hitachi Group Code of Ethics and Business Conduct. For all other reports outside the scope of the Whistleblower Protection and Public Disclosure Act, the general whistleblowing procedure shall apply, including for violations of the Ethical namely:

FINAL PROVISIONS

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the [Ethics Point- Hitachi Global \(Web Portal\)](#) and [EthicsPoint- Hitachi Global \(Hotline\)](#).

You will be linked to the Hitachi Group site. Please opt for 'Hitachi Energy' when the question is being asked (by the operator or in the online form), alternatively, employees can also report their concerns directly to the Office of Special Investigations, which is a corporate function within Hitachi Energy via mailbox global-pg-ethics@hitachienergy.com; or send correspondence by post to the Office of Special Investigations: George Hintzenweg 81 - 3068 AX Rotterdam, The Netherlands.

The process for reporting violations is described in PGR-LI-19 - Whistleblower Policy which is an integral part of these Rules.



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§ 3. These Internal Rules shall be kept up to date by reviewing at least once every three years and an analysis of the practice of implementing WPPDA.

§ 4. Attachment No. 1



Form CPDP -
English.pdf

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