

Nidec Global Compliance Hotline Policy

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1. Objectives of this Policy

Nidec Corporation and its global affiliates (hereinafter individually or collectively referred to as “**Nidec Group**” or “**Nidec**”) commits to conducting the business with honesty and integrity and expects all employees to maintain high standards in accordance with the Nidec Group Compliance Code of Conduct (hereinafter referred to as the “**Code of Conduct**”). A culture of openness and accountability is essential to prevent illegal or unethical conduct from occurring or to address them when they do occur.

The objectives of the Nidec Global Compliance Hotline (hereinafter referred to as the “**Compliance Hotline**”) and this Nidec Global Compliance Hotline Policy (hereinafter referred to as the “**Policy**”) are to:

- 1) Provide a way for Covered Individuals (as defined below) acquiring information in a work-related context to report potential violations of applicable law, of the Code of Conduct, or of company policies in a manner that preserves confidentiality and assures non-retaliation;
- 2) Encourage Covered Individuals to report suspected non-compliance as soon as possible;
- 3) Describe the reporting methods Nidec has established through which such reports or questions can be raised;
- 4) Provide additional guidance for the identification, reporting, and management of such reports or questions or to obtain guidance regarding compliance and ethics questions; and
- 5) Affirm Nidec’s position that retaliation of any type against an individual who, in good faith, raises a concern will not be tolerated.

2. Scope – Who is covered by this Policy

This Policy applies to all individuals who work in Nidec at all levels of the organization, including directors, officers, managers and employees, regardless of whether full-time, part-time, associate, fixed-term or temporary staff, trainees, interns, volunteers, of all divisions, subsidiaries, partly-owned subsidiaries where Nidec has management control or owns more than 50% of the stock and joint ventures (collectively referred to as “**Employees**”), and third parties, such as, without limitation, job applicants, shareholders, vendors, suppliers, sub-contractors, who in a work-related context have acquired information about potential violations of law or of the Code of Conduct or of Nidec company policies. In addition, former Employees may submit reports by using the Compliance Hotline. All such individuals covered by this Policy are individually or collectively referred to as “**Covered Individuals**”. Covered Individuals who raise a concern to the Compliance Hotline may also be referred to in this Policy as “**whistle-blowers**” or “**reporters**”.

3. Subject matter of report

Covered Individuals are strongly encouraged to promptly report any conduct or activity that they believe may violate applicable legal requirements, the Code of Conduct or Nidec company policies (“**Noncompliance Concerns**”). These may include, but are not limited to:

- Criminal activity, including theft;
- Financial reporting irregularities or control deficiencies;
- Bribery or any potential bribes, kickbacks, or improper payments made by, or received by, Employees in order to improperly influence a decision-making process of the recipient;
- Fraud;
- Embezzlement;
- Retaliation;
- Unsafe work conditions;
- Unfair labor practices;
- Harassment of any kind;
- Discrimination of any kind;
- Unauthorized disclosure of confidential information;
- Conflict of interest;
- Violation in relation to product quality and/or safety;
- Failure to comply with any legal obligation or regulatory requirements;
- Violation of any other laws or internal policies or procedures, including the Code of Conduct, or any potential violations of laws regarding antitrust/competition, import/export, bribery, or other laws or regulations governing corporate conduct, or falsification of financial documents;
- Any legal or ethical issue, whether or not material, that involves a member of management (i.e. President, Business Leader, Legal Representative, General Manager, Country Leader, Manager of a functional department, Director of a Board, etc.) or a member (regardless of level or function) of any governance function team (i.e., Compliance, Legal, Internal Audit, Committee, etc.);
- Other unethical or unlawful conduct;
- Any other issue that in the discretion of Nidec management or other governance department is considered significant or could potentially be significant (e.g., negative press, significant business impact, etc.); and
- Deliberate concealment of any of the above matters.

4. The way to inform / report

In many cases you will be able to raise Noncompliance Concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively.

However, where the matter is more serious, where the matter involves your manager, where you feel that your line manager has not addressed your concern, or where you prefer not to raise the matter with your line manager for any reason, please utilize any of the methods below to raise your concern or ask your question.

The Compliance Hotline can be contacted using multiple reporting channels. These include the following:

a) Compliance Hotline Email:

- HQ (Japan): nidec_hotline_hq@nidec.com
- Americas: nidec_hotline_americas@nidec.com*
- China: nidec_hotline_china@nidec.com
- Europe, Middle East, & Africa: nidec_hotline_europe@nidec.com**
- Southeast Asia: nidec_hotline_asia@nidec.com

* *must not be used by reporters in Brazil*

** *must not be used by reporters in Italy (refer to Appendix 1 for details)*

Unless otherwise stated in Appendix 1, all Covered Individuals can use one of the Compliance Hotline Email addresses. Nidec Corporation’s Compliance Office (hereinafter referred to as the “**NCJ Compliance Office**”) and the Regional Compliance Offices/Officers for the relevant region (“**Regional Compliance Office**”) receive emails sent to the Compliance Hotline Email addresses.

Additional reporting methods available in the Americas region and the Europe, Middle East, & Africa region (see paragraphs b) and c)) and in Japan (see paragraphs b) and d)):

b) Compliance Hotline Telephone:

- Japan*: 075-935-6160
**available only in Japanese language* (+81 75-935-6160 if calling from outside Japan)
- Inside the USA**: 877-522-7545
- Outside the USA**: +1 770-582-5264***
*** This telephone facility is operated by Navex Global EthicsPoint. It is available only for the Americas region, for the Europe, Middle East and Africa region and for the ACIM and MOEN Business Units in China and South East Asian countries.* **** Alternate dialing instructions within specific countries can be found in the Compliance Hotline Telephone Dialing Instructions in Appendix 2.*

c) Compliance Hotline Website:

- <http://nideccompliance.ethicspoint.com/> *
**The Compliance Hotline Website is operated by Nidec’s third-party hotline service provider, Navex Global EthicsPoint. It may only be used by reporters in the Americas region, in the Europe, Middle East and Africa region and in ACIM and MOEN Business Units in China and South East Asian countries.*

NCJ Compliance Office and the Regional Compliance Officers in your region will receive reports submitted to Nidec’s third-party hotline service provider, Navex Global EthicsPoint, through the Compliance Hotline Telephone and the Compliance Hotline Website.

d) Third-party point of contact in Japan:

(available only for Employees of Nidec companies in Japan, and available only in Japanese)

Kitahama Partners
Tel.: 06-6202-9621
Email: info-nidec-hotline@kitahama.or.jp

The Compliance Hotline Email, the Compliance Hotline Telephone, the Compliance Hotline Website and the third-party point of contact in Japan are all the different means of contacting the Compliance Hotline that are made available by Nidec.

Prompt reporting of Noncompliance Concerns is required as it gives Nidec the opportunity to investigate the matter and take corrective action where needed. This allows Nidec to reduce the risk of damage to the reporter, their coworkers, Nidec, third parties, and/or the communities in which we operate.

5. Available languages

Reports to the Compliance Hotline can be made in multiple languages.

Reports to the Compliance Hotline Email can be sent in any language but responses will be given only in the languages below:

- HQ (Japan): Japanese or English
- Americas: English, Spanish or Portuguese
- China: Chinese, Japanese or English
- Europe: English, French, Italian, or Romanian
- Southeast Asia: English, Hindi, or Tagalog

Reports to the Compliance Hotline Telephone or to the Compliance Hotline Website can be made in the languages below:

Compliance Hotline Telephone: see languages listed in Paragraphs 4 b), 4 d), this section above and in Appendix 2.

Compliance Hotline Website:

- Bulgarian
- Chinese (simplified)
- Czech
- English
- French (European)
- German
- Hungarian
- Italian
- Polish
- Portuguese (Brazilian)
- Romanian
- Serbian (Cyrillic)
- Slovak
- Spanish (Latin American)

6. Confidentiality and anonymity

Subject to country-specific deviations or additional requirements set out in the Appendices (which may be amended as necessary), Covered Individuals who report Noncompliance Concerns through the Compliance Hotline may remain anonymous. However, due to the nature of the investigation, or where it may be required by law or regulation, it may be necessary to disclose the identity of the reporter.

The extent of sharing information related to any Noncompliance Concerns reported through the Compliance Hotline (including matters that lead to identifying the whistle-blower) will be limited to the minimum necessary based on the relations between investigations and corrective

actions, and those matters will be kept confidential. Those Employees who have violated this duty of confidentiality will be subject to disciplinary actions based on applicable company policy and/or laws and regulations.

There may be instances that require external investigation by third parties or by relevant government authorities but rest assured that the identity of the reporter will be kept confidential and protected to the maximum extent possible under the applicable law or regulation. However, due to the nature of the investigation, or where it may be required by law or regulation, it may be necessary to disclose the identity of the reporter.

Nidec has procedures in place for investigating Noncompliance Concerns that ensure consistency and fairness throughout the company. In some cases, it is imperative that we maintain attorney-client privilege in accordance with the applicable laws and that such cases be investigated under the guidance of Nidec's Legal Department. These procedures ensure that this will take place. Good judgment in managing reported Noncompliance Concerns is always required.

Please note that, depending on the allegation, maintaining strict anonymity may make the investigation and/or charging of the perpetrator difficult. Therefore, Covered Individuals are encouraged, to the extent possible, not to be anonymous when reporting Noncompliance Concerns.

7. Non-retaliation (prohibition of disadvantageous treatment, retaliation, and identification of the whistle-blower)

Covered Individuals should feel comfortable reporting Noncompliance Concerns without fear. Covered Individuals who in good faith raise genuine concerns under this Policy will be protected, even if they turn out to be mistaken. Covered Individuals must not suffer any detrimental treatment as a result of raising a genuine concern. This means that the whistle-blower will not be subject to a damages compensation claim from his/her company, or any other disadvantageous treatment, retaliation, or act of trying to identify him/her (hereinafter referred to as “**acts against protecting whistle-blowers**”) as a result of reporting information relating to Noncompliance Concerns. Any Employee who acts against protecting whistle-blowers based on the reasons for the whistle-blowing will be subject to disciplinary actions based on applicable company policy and/or laws and regulations. If any Covered Individual believes they have been subject to any acts against protecting whistle-blowers or have witnessed such acts, please inform the Regional Compliance Officers in your region or the Compliance Hotline immediately.

8. Investigation and corrective action

Once you have raised a Noncompliance Concern, the Regional Compliance Officers will carry out an initial assessment to determine the scope of any investigation. You may be required to provide further information. The Regional Compliance Officers will secure the impartiality and fairness of the Compliance Hotline and investigation process by ensuring that those with strong interests with any individual suspected of any Noncompliance Concern described in the report will not be involved in investigations, etc. In addition, upon launching investigations, the Regional Compliance Officers will give sufficient consideration to the way the investigation is carried out so as not to have the whistle-blower's identity revealed.

The Regional Compliance Officers will aim to keep the whistle-blower and any necessary and appropriate individuals, in the Regional Compliance Officers' discretion, informed of the progress of the investigation and its likely timescale in accordance with applicable laws and regulations. Additionally, at the conclusion of the investigation, the Regional Compliance Officers will promptly inform the whistle-blower of the findings of such investigations and, if appropriate or required in accordance with applicable laws and regulations, the results of executed corrective actions to the extent that doing so will not cause any breach of confidentiality, etc.

However, sometimes the need for confidentiality may prevent the whistle-blower from receiving specific details of the investigation or any corrective actions taken as a result. All persons involved in any part of the reporting or investigation process must treat any information about the investigation (including witness statements, collected data, and other records) as confidential and, to the extent possible by law, subject to the attorney-client privilege and attorney work product doctrine, as they may be applicable.

If the Regional Compliance Officers conclude that a reporter has made false allegations maliciously or with a view to personal gain, such reporter will be subject to disciplinary action based on applicable company policy and/or laws and regulations.

9. Informing and training

The Regional Compliance Officers may disclose an outlook of the record of operating the Compliance Hotline to the extent that doing so will not in any way cause trouble with the execution of the proper duties, maintenance of confidentiality regarding concerned parties, or protection of trust, honor, privacy, etc. The Regional Compliance Officers will regularly inform executive and other select Employees of the activity metrics, trends, and notable results related to the Compliance Hotline, and hold training presentations on such information to the extent confidentiality of the parties involved may be maintained.

10. Administration and operation

The Regional Compliance Officers will be responsible for managing and operating the Compliance Hotline. The Regional Compliance Officers will prepare records regarding actions based on the activities and administration of the Compliance Hotline and keep them for the appropriate period of time according to applicable laws and policies.

The Regional Compliance Officers are given the sole authority to have access to the relevant Compliance Hotline Email account, to have access as administrators to the Navex EthicsPoint system, to make referrals of matters, or to assign additional internal or external investigators. The Regional Compliance Officers (and by extension, the Regional Compliance Office staff and the investigators they assign to carry out the investigation) have day-to-day operational responsibility of implementing this Policy in their relevant region collaboratively with the NCJ Compliance Office.

11. Processing of personal data

The Nidec Global Compliance Hotline Privacy Notice set out in Appendix 3 describes how personal data is processed in relation to a report made to the Compliance Hotline and any investigation resulting from such report.

12. Additional jurisdiction-specific matters

Appendix 1 sets out deviations to the Policy for specific jurisdictions.

13. Revision and abolition of the Policy

Except for amendments to the Appendices which can be made by the Regional Compliance Officers, this Policy may only be revised or abolished by the Chief Compliance Officer.

Appendix 1 – Jurisdiction-Specific Deviations to the Policy

PART 1: EUROPEAN UNION

The Compliance Hotline mechanism described in the Policy is adopted by and made available to the Employees of the relevant Nidec companies in each European Union (“EU”) country (the “Company”) as well as to other Covered Individuals in those countries.

National laws transposing Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (the “**Whistleblower Directive**”) impose certain requirements that deviate from this Policy. With regards to reports made to the Compliance Hotline emanating from EU countries, the following specific provisions shall apply in addition to or in place of the provisions set out in the Policy:

SECTION 1 – ALL EU COUNTRIES

Except as otherwise stated in Section 2 below, the provisions of this Section 1 apply to all Nidec companies in EU countries.

1.1 Topics covered by the Whistleblower Directive

A reporter is protected in the event of raising, in good faith, genuine concerns over the following breaches of EU law concerning:

- public procurement,
- financial services, products and markets, and prevention of money laundering and terrorist financing,
- product safety and compliance,
- transport safety,
- radiation protection and nuclear safety,
- public health,
- consumer protection,
- protection of privacy and personal data, and security of network and information systems,
- financial interests of the EU,
- breaches relating to the internal market, including breaches of EU competition, rules, State aid rules and rules of corporate tax.

The foregoing topics are referred to as the “**Whistleblower Directive Reporting Topics**”.

1.2 Scope – who is covered by the Policy

In addition to the persons defined as Covered Individuals in paragraph 2 of the Policy, Covered Individuals also include:

- (a) “facilitators” (i.e., third persons connected with the reporting persons, for example, individuals and non-profit entities such as trade unions and associations who are in contact with the reporter), legal representatives, relatives or colleagues of the reporter,
- (b) personnel of contractors, subcontractors and suppliers who are in a pre-contractual relationship with the Company or whose contractual relationship with the Company has come to an end, and
- (c) legal entities that the reporting person owns, works for, or are otherwise connected with in a work-related context.

1.3 Rights of the individuals under investigation

Individuals under investigation are granted the following rights:

- (a) the right to an effective remedy and to a fair proceeding;
- (b) the right to the presumption of innocence;
- (c) the right to preserve their identity and the confidentiality of the facts being investigated; and
- (d) the right to defense, including the right to be heard and to access their file. Access to the file will be limited to information that does not allow the reporter to be identified, and it will take place at a time and in a manner deemed appropriate to ensure the successful completion of the investigation.

1.4 Emergency situations

The Compliance Hotline mechanism is not in lieu of emergency services which must always be contacted if appropriate (e.g., in case of an emergency situation or an imminent risk to a person's physical integrity).

SECTION 2 – SPECIFIC EU COUNTRIES

The following country-specific provisions apply in addition to or in place of the provisions set out in the Policy and in addition to the provisions set out in Part 1, Section 1:

2.1 AUSTRIA

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Austria with more than forty-nine (49) employees.

2.1.1 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct an investigation and to provide feedback to the reporter should not exceed three (3) months from the acknowledgement of receipt of the report.

2.1.2 Other reporting options:

- (a) For Nidec companies in Austria with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) In addition to the reporting channels set out paragraph 4 of the Policy, reports may be made face to face (via video conferencing) by arrangement following initial contact through one of the reporting channels specified in paragraph 4 of the Policy.
- (c) Reporters are encouraged to report their concerns internally using the reporting channels specified in paragraph 4 of the Policy. However, in certain circumstances where reporting to Nidec's Compliance Hotline is not feasible, reports may be made externally as set out in Schedule 1.

2.2 BELGIUM

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Belgium with more than forty-nine (49) employees.

2.2.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Belgium are protected in the event of raising, in good faith, genuine concerns in the areas of prevention of social and fiscal fraud.

2.2.2 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the reporter should not exceed three (3) months from the acknowledgement of receipt of the report.

2.2.3 Other reporting options:

- (a) For Nidec companies in Belgium with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.3 BULGARIA

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Bulgaria with more than forty-nine (49) employees.

2.3.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Bulgaria are protected in the event of raising, in good faith, genuine concerns over breaches of Bulgarian law in the following areas:

- (a) public procurement;
- (b) financial services;
- (c) products and markets;
- (d) money laundering and terrorist financing;
- (e) protection of the environment;
- (f) radiation protection and nuclear safety;
- (g) food and feed safety;
- (h) animal health and welfare;
- (i) public health;
- (j) consumer protection;
- (k) protection of privacy and personal data;
- (l) security of network and information systems;
- (m) payment of due public state and municipal receivables and cross border tax arrangements;
- (n) labour law and law on public service; and
- (o) crimes of a general nature in a work-related context.

There is no obligation to follow up on reports of breaches committed more than two (2) years ago.

2.3.2 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated.

2.3.3 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the

reporter should not exceed three (3) months from the acknowledgement of receipt of the report.

2.3.4 Other reporting options:

- (a) For Nidec companies in Bulgaria with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.4 CZECH REPUBLIC

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in the Czech Republic with more than forty-nine (49) employees.

2.4.1 Scope of application of the Compliance Hotline:

There is no obligation to accept or follow up on reports from persons who do not perform work or similar activities (e.g., business partners, suppliers, subcontractors) for the Company.

2.4.2 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in the Czech Republic are protected in the event of raising, in good faith, genuine concerns over breaches of Czech law in the following areas:

- (a) mandatory audit and other auditing services;
- (b) transportation and road traffic safety;
- (c) public auctions;
- (d) protection of internal order and security; and
- (e) protection of electronic communications.

2.4.3 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated. An anonymous reporter will not be protected against retaliation as long as the reporter remains anonymous.

2.4.4 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the reporter should not exceed thirty (30) days from the acknowledgement of receipt of the report. In complex cases, this deadline may be extended, up to two (2) times, for a maximum of an additional thirty (30) days each time. The reporter shall be informed in writing of the extension of the deadline and the reasons for it before the expiry of the deadline.

2.4.5 Other reporting options:

- (a) For Nidec companies in the Czech Republic with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) Reports may be made face to face (or via video conferencing) by arrangement following initial contact through one of the reporting channels specified in paragraph 4 of the Policy.
- (c) See Schedule 1 for external reporting channels.

2.5 DENMARK

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Denmark with more than forty-nine (49) employees.

2.5.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Denmark are protected in the event of raising, in good faith, genuine concerns in relation to serious offences and other serious matters (e.g. sexual harassment, serious interpersonal conflicts and serious harassment).

2.5.2 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated. An anonymous reporter will not be protected against retaliation as long as the reporter remains anonymous.

2.5.3 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the reporter should not exceed three (3) months from the acknowledgement of receipt of the report.

2.5.4 Other reporting options:

- (a) For Nidec companies in Denmark with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.6 FRANCE

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in France with more than forty-nine (49) employees.

2.6.1 Reporting Topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in France are protected in the event of raising, in good faith, genuine concerns over breaches of French law in the following areas:

- (a) crimes or offences;
- (b) violations or an attempt to conceal a violation of:
 - i. an international commitment duly ratified or approved by France,
 - ii. a unilateral act of an international organisation taken on the basis of such a commitment,
 - iii. the law or regulations, and
 - iv. a serious threat or harm to the public interest.

The facts reported may concern information on a crime, offence or violation of the law and attempts to conceal these violations.

2.6.2 Admissibility of anonymous reports:

Anonymous reports to the Compliance Hotline are not encouraged and there is no obligation for anonymous reports to be accepted or investigated. An anonymous reporter will not be protected against retaliation as long as the reporter remains anonymous.

2.6.3 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the reporter should not exceed three (3) months from the acknowledgement of receipt. This timeframe for providing feedback to the reporter does not apply to reports made anonymously.

2.6.4 Other reporting options:

- (a) For Nidec companies in France with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.7 GERMANY

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Germany with more than forty-nine (49) employees.

2.7.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Germany are protected in the event of raising, in good faith, genuine concerns over breaches of German law in the following areas:

- (a) infringements which are punishable by law;
- (b) infringements which are subject to a fine, insofar as the infringed regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies;
- (c) other infringements of Federal and Land legislation as well as directly applicable legal acts of the European Union and the European Atomic Energy Community relating, amongst others, to:
 - i. combating money laundering and terrorist financing,
 - ii. product safety and conformity,
 - iii. road, rail, maritime and civil aviation safety,
 - iv. safe transport of dangerous goods by road, rail and inland waterways,
 - v. protection of the environment,
 - vi. radiation protection and nuclear safety,
 - vii. promotion of the use of energy from renewable sources and energy efficiency,
 - viii. food and feed safety,
 - ix. consumer rights and protection,
 - x. protection of privacy in electronic communications, the protection of confidentiality of communications, the protection of personal data and privacy of users in the electronic communications sector,
 - xi. protection, processing and transfer of personal data,
 - xii. security of information technology.

2.7.2 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to provide a response to the reporter should not exceed three (3) months from the acknowledgement of receipt of the report (or a total of three (3) months and seven (7) days in case receipt of the report was not confirmed).

2.7.3 Other reporting options:

- (a) For Nidec companies in Germany with more than two hundred and forty-nine (249)

- employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) Reports may be made face to face (via video conferencing) by arrangement following initial contact through one of the reporting channels specified in paragraph 4 of the Policy.
 - (c) See Schedule 1 for external reporting channels.

2.8 GREECE

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Greece with more than forty-nine (49) employees.

2.8.1 Reporting topics:

Covered Individuals in Greece are protected in the event of raising, in good faith, genuine concerns in relation to the Whistleblower Directive Reporting Topics in Section 1.1.

2.8.2 Admissibility of anonymous reports:

An anonymous reporter will be protected against retaliation if their identity has been revealed.

2.8.3 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the reporter should not exceed three (3) months from the acknowledgement of receipt of the report.

2.8.4 Other reporting options:

- (a) For Nidec companies in Greece with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) In addition to the reporting channels set out paragraph 4 of the Policy, reports may be made face to face (via video conferencing) by arrangement following initial contact through one of the reporting channels specified in paragraph 4 of the Policy.
- (c) See Schedule 1 for external reporting channels.

2.9 HUNGARY

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Hungary with more than forty-nine (49) employees.

2.9.1 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated.

2.9.2 Timeframes:

An acknowledgement of receipt of the report shall be made within seven (7) days. If the report is deemed admissible, the timeframe to conduct the investigation and to provide feedback to the whistleblower is thirty (30) days, which may be extended in justified cases, without exceeding three (3) months. The reporter shall be notified of the extension of the deadline and the reason for it, as well as the expected date of the end of the investigation.

2.9.3 Other reporting options:

- (a) For Nidec companies in Hungary with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).

- (b) See Schedule 1 for external reporting channels.

2.10 IRELAND

2.10.1 Reporting Topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Ireland are protected in the event of raising, in good faith, genuine concerns in relation to the Company in the following areas:

- (a) where an offence has been, is being, or is likely to be committed;
- (b) where a person has failed, is failing or is likely to fail to comply with any legal obligation (other than one arising under their contract of employment or other working contract);
- (c) where a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) where the health and safety of any individual has been, is being or is likely to be endangered;
- (e) where the environment has been, is being or is likely to be damaged;
- (f) where an unlawful or otherwise improper use of funds or resources of a public body, or of other public money, has occurred, is occurring or is likely to occur;
- (g) where there has been an act or omission by or on behalf of a public body that is oppressive, discriminatory or grossly negligent or constitutes mismanagement.

2.10.2 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated.

2.10.3 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, feedback shall be provided to the reporter within three (3) months from the acknowledgement of receipt of the report (or within three (3) months and seven (7) days if it was not acknowledged in writing).

If the reporter then requests in writing, further feedback shall be provided to them at three (3) month intervals, until the report is closed, dating from the period on which the first set of feedback is provided after the initial report.

2.10.4 Other reporting options:

- (a) For Nidec companies in Ireland with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.11 ITALY

2.11.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Italy are protected in the event of raising, in good faith, genuine concerns over breaches of Italian law in the following areas:

- (a) administrative, financial, civil and criminal offences that do not fall within the provisions of the Whistleblower Directive; and

- (b) infringements related to provisions of Legislative Decree no. 231/2001 or to organisational and management models therein provided, which do not fall within the provisions of the Whistleblower Directive.

2.11.2 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, the report shall be followed up and feedback shall be provided to the reporter within three (3) months from the acknowledgement of receipt of the report.

2.11.3 Other reporting options:

- (a) For Nidec companies in Italy with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) In accordance with guidelines issued by the Italian Anticorruption Authority (ANAC), reporters in Italy *must not use the Compliance Hotline Email*; the Compliance Hotline can be contacted via any of the other reporting channels set out in paragraph 4 b) and c) of the Policy.
- (c) Reports may be made face to face (via video conferencing) by arrangement following initial contact through one of the reporting channels specified in paragraph 4 of the Policy.
- (d) See Schedule 1 for external reporting channels.

2.12 NETHERLANDS

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in The Netherlands with more than forty-nine (49) employees.

2.12.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in The Netherlands are protected in the event of raising, in good faith, genuine concerns regarding an act or omission jeopardizing the public interest in relation to:

- (a) a violation or risk of violation of a statutory regulation or internal company regulation containing a concrete obligation established by the company pursuant to a statutory regulation; or
- (b) a danger to:
 - i. public health,
 - ii. the safety of persons,
 - iii. the environment,
 - iv. the proper functioning of the public service or an enterprise.

2.12.2 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, the report shall be followed up and feedback shall be provided to the reporter within three (3) months from the acknowledgement of receipt of the report.

2.12.3 Other reporting options:

- (a) For Nidec companies in the Netherlands with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.13 POLAND

The provisions of this Appendix 1 (Part 1) apply only to Nidec companies in Poland with more than forty-nine (49) employees.

2.13.1 Scope of application of the Compliance Hotline:

In addition to the persons defined as Covered Individuals in paragraph 2 of the Policy and in Section 1.2 of this Appendix, Covered Individuals can also include the following who have a concern to report in relation to the Company:

- (a) members of the administrative, management or supervisory body of the Company,
- (b) public officials,
- (c) military personnel.

2.13.2 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, feedback shall be provided to the reporter within three (3) months from the acknowledgement of receipt of the report (or within three (3) months and seven (7) days if it was not acknowledged in writing).

2.13.3 Other reporting options:

- (a) For Nidec companies in Poland with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraphs 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.14 ROMANIA

The provisions of this Appendix 1 (Part 1) apply to Nidec companies in Romania with more than forty-nine (49) employees.

2.14.1 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Romania are protected in the event of raising, in good faith, genuine concerns over breaches of Romanian law that have occurred or are likely to be occurring.

2.14.2 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, the report shall be followed up and feedback shall be provided to the reporter within three (3) months from when the report was received (or a total of three (3) months and seven (7) days in case receipt of the report was not confirmed), unless the information could jeopardize taking such measures.

2.14.3 Other reporting options:

- (a) For Nidec companies in Romania with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.15 SLOVAKIA

The provisions of this Appendix 1 (Part 1) apply only to Nidec companies in Slovakia with more than forty-nine (49) employees.

2.15.1 Scope of application of the Compliance Hotline:

In addition to the persons defined as Covered Individuals in paragraph 2 of the Policy and in Section 1.2 of this Appendix, Covered Individuals can also include the following who have a concern to report in relation to the Company:

- (a) persons on a basis other than employment relationship, including civil law contracts,
- (b) self-employed persons,
- (c) members of the administrative, management or supervisory body of the Company,
- (d) persons working under the supervision and direction of the Company's contractors, subcontractors and suppliers, including on the basis of civil law contracts,
- (e) public officials,
- (f) military personnel.

2.15.2 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Slovakia are protected in the event of raising, in good faith, genuine concerns over breaches of Slovakian law in the following areas:

- (a) anti-social activities (including, for example, unethical practices in the workplace, pathological phenomena that have a negative impact on society that are the basis for criminal activity such as aggressive behaviour, alcoholism, gambling); and
- (b) serious anti-social activities, including:
 - i. crimes against the financial interests of the EU, crimes in public procurement, crimes against public officials, corruption (as defined in the Slovakian Whistleblowing Act),
 - ii. all offences punishable by a maximum penalty of more than two (2) years' imprisonment,
 - iii. administrative offences for which the upper limit of the fine is determined by calculation,
 - iv. administrative offences where a fine may be imposed with an upper limit of at least EUR 30,000.

2.15.3 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days. If the report is deemed admissible, the report shall be followed up and feedback shall be provided to the reporter within ninety (90) days of receipt of the report.

If a crime has been committed, the matter will be reported to the police or to the public prosecutor for assessment. The reporter will be informed of the decision to report the matter to the authorities. Within ten (10) days after receipt of the result of the assessment by the authorities, the reporter will be given feedback on the assessment.

2.15.4 Other reporting options:

- (a) For Nidec companies in Slovakia with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.16 SPAIN

2.16.1 Scope of application of the Compliance Hotline:

In addition to the persons defined as Covered Individuals in paragraph 2 of the Policy and in Section 1.2 of this Appendix, Covered Individuals can also include the following who have a concern to report in relation to the Company:

- (a) persons belonging to the administrative body, management or supervisory body of the Company, including non-executive members,
- (b) employees of the administration,
- (c) self-employed persons,
- (d) persons working under the supervision and direction of the Company's contractors, subcontractors and suppliers.

2.16.2 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Spain are protected in the event of raising, in good faith, genuine concerns over breaches of Spanish law in the following areas:

- (a) infringements relating to occupational health and safety;
- (b) infringements that directly affect or undermine the general interest where no specific regulation applies, the general interest being deemed to be affected when it involves an economic loss for the Public Treasury.

2.16.3 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated.

2.16.4 Timeframes:

An acknowledgement of receipt of the report shall be given to the reporter within seven (7) days, unless this could jeopardize the confidentiality of the report. If the report is deemed admissible, the report shall be investigated and feedback shall be provided to the reporter within three (3) months of receipt of the report, or if no acknowledgement of receipt of the report was sent, within three (3) months from expiration of the seven (7) day period following receipt of the report. In cases of particular complexity, the period to complete the investigation may be extended for an additional three (3) months.

2.16.5 Other reporting options:

- (a) For Nidec companies in Spain with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

2.17 SWEDEN

2.17.1 Scope of application of the Compliance Hotline:

In addition to the persons defined as Covered Individuals in paragraph 2 of the Policy and in Section 1.2 of this Appendix, Covered Individuals can also include self-employed persons seeking or performing assignments who have a concern to report in relation to the Company.

2.17.2 Reporting topics:

In addition to the Whistleblower Directive Reporting Topics in Section 1.1, Covered Individuals in Sweden are protected in the event of raising, in good faith, genuine concerns in relation to

misconduct in a work-related context for which there is a “public interest”.

2.17.3 Admissibility of anonymous reports:

There is no obligation for anonymous reports to be accepted or investigated.

2.17.4 Timeframes:

The Reporter shall be given confirmation that the report has been received within seven (7) days (unless the reporter has asked not to be contacted).

2.17.5 Other reporting options:

- (a) For Nidec companies in Sweden with more than two hundred and forty-nine (249) employees, there is an option to report locally (see paragraph 4 b) and c) of the Policy).
- (b) See Schedule 1 for external reporting channels.

Schedule 1 (Appendix 1): External Reporting Options

Country	External Reporting Channels
Austria	<ul style="list-style-type: none"> • The Federal Office for the Prevention of and Fight against Corruption • The Federal Competition Authority for competition law infringements • The Financial Market Authority for violation of regulatory laws • The Central Money Laundering Reporting Office for violations of anti-money laundering rules
Belgium	The Federal Ombudsman will receive and redirect reports to the appropriate competent authority
Bulgaria	The Commission for Personal Data Protection will receive and redirect reports to the appropriate competent authority
Czech Republic	<ul style="list-style-type: none"> • The Ministry of Justice of the Czech Republic
Denmark	<ul style="list-style-type: none"> • The National Whistleblower Scheme of the Danish Data Protection Agency
France	<ul style="list-style-type: none"> • The Defender of Rights, who will receive and redirect reports to the appropriate competent authority
Germany	<ul style="list-style-type: none"> • The Federal Office of Justice • The Federal Financial Supervisory Authority • The Federal Cartel Office
Greece	<ul style="list-style-type: none"> • The National Transparency Authority
Hungary	<p>The list of external authorities has been provided in Act XXV of 2023 and Government Decree No. 225/2023. (VI. 8.):</p> <ul style="list-style-type: none"> • Budapest Government Office of the Capital • The central body of the public health administration • The National Food Chain Safety Office • The central body of the pharmaceutical public administration • The national waste management authority • The Hungarian State Treasury • The National Environmental Protection Authority • The Minister responsible for transport • The National Tax and Customs Administration • The National Police Headquarters • The National Authority for Nature Conservation
Ireland	The Office of the Protected Disclosures Commissioner who will receive and redirect the report to the appropriate competent authority or if applicable, to a prescribed person listed in Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020

Italy	<ul style="list-style-type: none"> • The Italian Anticorruption Authority (ANAC)
Netherlands	<ul style="list-style-type: none"> • The Authority for Consumers and Markets (Autoriteit Consument & Markt) • The Authority for the Financial Markets (Autoriteit Financiële Markten) • The Data Protection Authority (Autoriteit Persoonsgegevens) • The Central Bank of the Netherlands (De Nederlandsche Bank) • The Whistleblowers Authority (Het Huis voor Klokkenluiders) • The Health and Youth Inspectorate (Inspectie gezondheidszorg en jeugd) • The Dutch Healthcare Authority (de Nederlandse Zorgautoriteit) • The Authority for Nuclear Safety and Radiation Protection (Autoriteit Nucleaire Veiligheid en Stralingsbescherming); or • Other competent authorities as may later be designated by ministerial public decree on the basis of the Dutch Whistleblowing Protection Act (Wet Bescherming Klokkenluiders)
Poland	No local external reporting channel has been designated at the date of publication of this Policy
Romania	The National Integrity Agency will receive and redirect the report to the appropriate competent authority
Slovakia	The Whistleblower Protection Office
Spain	<ul style="list-style-type: none"> • Autoridad Independiente de Protección del Informante, as well as, any other competent regional authority, including, without limitation, the Anti-Fraud Office of Catalonia • Comisión Nacional de los Mercados y la Competencia (CNMC) • Comisión Nacional de los Mercados de Valores (CNMV) • Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (Sepblac)
Sweden	<p>Several Swedish authorities have been assigned by the Swedish Government to set up external reporting channels. These authorities shall be able to receive, follow up, and provide feedback within their respective field of responsibility, including, without limitation:</p> <ul style="list-style-type: none"> • Swedish Public Health Authority (Folkhälsomyndigheten) • Swedish Competition Authority (Konkurrensverket) • Swedish Financial Supervisory Authority (Finansinspektionen) • Swedish Economic Crime Authority (Ekobrottsmyndigheten) • Swedish Medical Products Agency (Läkemedelsverket)

PART 2: UNITED STATES OF AMERICA

SECTION 1 – CALIFORNIA

If you are a resident of California, you are covered by certain whistleblower protections. Where applicable, your whistleblower rights include:

- Disclosure of violations of law: Your employer may not prevent you from making certain disclosures if you have reasonable cause to believe you are providing information about violations of state or federal laws, violations of local, state, or federal rules or regulations, or noncompliance with those rules or regulations, regardless of whether making such disclosures are part of your job duties.
- Disclosure of working conditions: Your employer may not require you to refrain from disclosing information about your work conditions as a condition of employment and may not require you to sign waivers or other documents that appear to deny your right to make these disclosures. Provided, however, this prohibition does not permit you to disclose proprietary information, trade secrets, or other legally privileged information without your employer's consent.
- Retaliation prohibited: Your employer may not retaliate against you (i) for making permitted disclosures about violations of state or federal laws, violations of local, state, or federal rules or regulations, or noncompliance with those rules or regulations; (ii) because your employer believes that you made or might make these disclosures; (iii) for refusing to participate in activities that would violate state or federal laws, violate local, state, or federal rules or regulations, or result in noncompliance with these rules or regulations; (iv) for exercising any of these rights in any prior employment; or (v) because your family member has engaged, or is perceived to have engaged, in any of these protected acts.
- Further information: You are directed to the following link for additional information regarding the rights of whistleblowers in **California**: <https://www.dir.ca.gov/dlse/WhistleblowersNotice.pdf>.

SECTION 2 – NEW YORK

If you are a resident of New York, you are covered by certain whistleblower protections. Where applicable, your whistleblower rights include:

- Retaliatory action prohibited. An employer may not take retaliatory action against you because you (i) disclose or threaten to disclose, to a supervisor or public body, an activity, policy, or practice of the employer that you reasonably believe violates a law, rule, or regulation; or that you reasonably believe poses a substantial, specific danger to public health or safety, provided that, before making this disclosure to a public body, you must make a good faith effort to notify the employer by bringing the activity, policy, or practice to the attention of a supervisor and give the employer a reasonable opportunity to correct the activity, policy, or practice; (ii) provide information to or testify before any public body conducting an investigation, hearing, or inquiry into such a violation by the employer; or (iii) object to or refuse to participate in an activity, policy, or practice.
- Definition of retaliatory action. Retaliatory action means an adverse action taken by an employer or agent to discharge, threaten, penalize, or discriminate against you exercising your rights, including: (i) adverse employment actions or threats to take such adverse employment actions against you in the terms of conditions of employment including, but not limited to discharge, suspension or demotion; (ii) actions or threats to take such actions that would adversely impact your current or future employment as a former employee; or (iii) threatening to contact or contacting U.S. immigration authorities, or otherwise reporting or threatening to report your suspected citizenship or immigration status or status of your family or household member to a federal, state, or local agency.
- Further information: You are directed to the following link for additional information regarding the rights of whistleblowers in New York: https://dol.ny.gov/system/files/documents/2022/02/1s740_1.pdf.

Appendix 2 – Compliance Hotline Telephone Dialing Instructions

COUNTRY	TELEPHONE NUMBER	LANGUAGES
Australia	1800818240	English
Austria	0800 298709	German, English
Belgium	0800 13 614	Flemish, French, German, English
Brazil	0800 591 1627	Portuguese, English
Bulgaria	0800 46 037	Bulgarian, English
Canada	844-543-8359	English, French
China	4001200262	Mandarin, Cantonese, English
Czech Republic	800400180	Czech, English
Denmark	80830911	Danish, English
Egypt	015 01718015	Arabic, French, English
France	0800 90 71 48	French, English
Germany	0800 1822872	German, English
Greece	0800 4938 21404	Greek, English
Hong Kong	800902099	Cantonese, English
Hungary	06 80 019 664	Hungarian, English
India	022 5032 3049	Kannada, Hindi, English
Indonesia	021 31141481	Indonesian, English
Ireland	1800456718	English
Italy	800819791	Italian, English
Japan	0800-300-9289	Japanese, English
Kenya	0800 222 265	Swahili, English
Korea, Republic of	00744877	Korean, English
Malaysia	1800-81-0851	Malay, English
Mexico	8002660245	Spanish, English
Netherlands	0800 0235305	Dutch, English
Norway	80062513	Norwegian, English
Philippines	02 8540 0357	Tagalog, English
Poland	800005413	Polish, English
Romania	0800 890 658	Romanian, English
Saudi Arabia	8008501673	Arabic, English
Serbia	0800 800835	Serbian, English
Singapore	8004922813	Mandarin, English, Malay
Slovak Republic	0800 601 182	Slovak, English
South Africa	080 099 1070	English, Afrikaans
Spain	900751974	Spanish, English
Sweden	020 79 41 59	Swedish, English
Switzerland	0800 010 013	German, French, Italian, English
Taiwan	00801-49-1322	Mandarin, English
Thailand	1800018210	Thai, English
Turkey	0080049240880141	Turkish, English
United Arab Emirates	8000120325	Arabic, English
United Kingdom (including Northern Ireland)	0808 238 7530	English
United States of America	844-543-8359	English, Spanish
Vietnam	024 7775 3153	Vietnamese, English

Appendix 3 - Nidec Global Compliance Hotline Privacy Notice

Published on: 1 April 2024

1. Introduction

We at Nidec have implemented the Compliance Hotline and the Code of Conduct reflecting our commitment to honesty, integrity and ethics.

This privacy notice provides you with information about the processing activities of Nidec acting as controller in connection with the reporting of concerns via the Compliance Hotline.

2. Controller

This privacy notice is issued on behalf of Nidec, so when we mention “Nidec”, “we”, “us” or “our” in the privacy notice, we are referring to the relevant company responsible for processing your personal data.

If you have any questions about this privacy notice, please contact us at ncj-hotline-privacy@nidec.com.

3. What personal data is processed as a result of a report to the Compliance Hotline?

The following categories of personal data are processed as a result of a report to the Compliance Hotline, or as a result of the investigation process arising from such report:

- identity,
- duties,
- contact information, and
- any other personal data

disclosed by or obtained from the reporter (only if the identity of the reporter is provided in the report), the people mentioned in the report, and the persons involved in gathering/providing information, processing or investigating the report.

You are free, and not required, to use the Compliance Hotline to make a report. Consequently, the provision of any personal data by a reporter is also voluntary as there is no statutory or contractual requirement to provide the personal data. Not providing any personal data may prevent us from investigating the report and any potential violations of the Code of Conduct.

The personal data is either provided by you, by individuals referred to in the report, by individuals identified during the investigation, by your supervisor, by authorized persons involved in the investigation of a report, by public authorities, or by other public resources.

Depending on the content of the report, it cannot be excluded that Nidec processes any sensitive personal data such as data revealing racial or ethnic origin, political opinion,

religious or philosophical beliefs, trade union membership, genetic data, biometric data for identification purposes, health data or data about a person's sex life or sexual orientation. Any sensitive personal data which are not necessary for the further investigation of a report, will be deleted promptly.

4. What are the purposes and the related legal bases of data processing?

The processing of personal data contained in reports submitted to the Compliance Hotline and obtained throughout any investigation is essential to implement the Code of Conduct, to ensure compliance with applicable law and to maintain integrity and ethics in Nidec's business practices. It enables the investigation of the reported conduct and any necessary corrective measures on the basis of such investigation, as set out in this privacy notice.

Nidec relies on the following legal bases for the processing, transfer to, and further processing by Nidec (if applicable) of personal data:

- Performance of the employment contract with you;
- Necessity for the legitimate interests pursued by Nidec or other third parties (such as existing or potential clients, governmental bodies, or courts) including in particular:
 - Ensuring compliance with the Code of Conduct,
 - Prevention of fraud and misconduct relating to accounting and auditing,
 - Compliance with legal requirements,
 - Prevention of bribery/corruption, banking and financial crime and insider trading,
 - Operation of a whistleblowing scheme, and
 - Internal investigations;
- Necessity to comply with legal obligations;
- To investigate potential crimes committed in the context of the employment relationship as permitted by local law; and
- Protection of the vital interests of you or of another individual.

In the rare case where sensitive personal data is processed for the investigation of a report, Nidec relies on the following legal bases:

- Carrying out the obligations and exercising the specific rights of Nidec or you in the field of employment and social security and social protection law as permitted by EU or national data protection law or by a collective agreement;
- Public data as made public manifestly by you;
- Establishing, exercising, or defending legal claims or as required whenever courts are acting in our judicial capacity; and
- For substantial public interest, as permitted by local data protection law.

5. Will personal data be transferred abroad?

The Compliance Hotline administrators are located in Japan, the EU, the United Kingdom, the United States, Mexico, Philippines and Brazil. For reports made to the Compliance Hotline from Australia, India, Indonesia, Malaysia, Philippines, Singapore, Taiwan, Thailand and Vietnam, the Compliance Hotline administrators are also located in India, and for reports made to the Compliance Hotline from China, the Compliance Hotline Administrators are also located in China. The following safeguards will be used to ensure

that the transfer of personal data to the Compliance Hotline administrators outside the EU are in compliance with the requirements of Art. 44 of the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”):

Nidec and the third party Compliance Hotline administrator (Navex Global) have entered into an appropriate data transfer agreement as referred to in Art. 46 of the GDPR, thereby establishing that the third party Compliance Hotline administrator will provide an adequate level of data protection for the personal data, which are accessible via the reports made to the Compliance Hotline.

Some of the further individuals who may receive personal data in connection with the Compliance Hotline or an investigation as described above may also be located in countries which have not been recognized by the European Commission as providing an adequate level of data protection. Transfers of personal data to such countries will be made in compliance with applicable law. In particular, Nidec will take the measures required to protect the security and the confidentiality of the data transferred (such as entering into the Standard Contractual Clauses published by the European Commission, the UK International Data Transfer Addendum to the European Commission’s standard contractual clauses for international data transfers (Addendum) or by putting in place other adequate safeguards). Further information can be requested via ncj-hotline-privacy@nidec.com.

6. How long is personal data retained?

Any personal data collected as a result of a report to the Compliance Hotline will be kept only as long as necessary and for the purpose for which it has been collected in compliance with applicable law.

7. Your rights

By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. Schedule 1 to this privacy notice lists your rights in certain specific jurisdictions. If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at ncj-hotline-privacy@nidec.com. Any such communication must be in writing.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

8. Changes to the privacy notice

We may update this privacy notice from time to time. Please check the date at the

beginning of this privacy notice to see when the privacy notice was last revised. Unless otherwise noted, any changes we make to this privacy notice will become effective immediately once published.

Privacy Notice Schedule 1

BRAZIL

If you are a **resident of Brazil**, the **Law No. 13.709 of 14 August 2018, General Personal Data Protection Law (as amended by Law No. 13.853 of 8 July 2019) (LGPD)** gives you certain rights regarding your personal data. You have the right to:

- a) Request access to your personal data that we hold;
- b) Request us to rectify inaccurate personal data; and
- c) Request us to anonymize, block the processing of personal data, which is unnecessary, excessive, or processed in non-compliance with the provisions of the LGPD.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

EUROPEAN UNION AND THE UNITED KINGDOM

If you are a resident of the European Union or the United Kingdom, the EU General Data Protection Regulation (Regulation (EU) 2016/679) and the and the UK Data Protection Act 2018 which is the implementation of General Data Protection Regulation (Regulation (EU) (2016/679) in the United Kingdom (collectively referred to as the “GDPR”) give you certain rights. You have the right to:

- a) Request access to your personal data (commonly known as a data subject access request);
- b) Request correction of the personal data that we hold about you;
- c) Request erasure of your personal data;
- d) Request the restriction of processing of your personal data;
- e) If applicable, to withdraw consent to processing of your personal data; and
- f) Make a complaint to the data protection authority.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

JAPAN

If you are a **resident of Japan**, the **Act on the Protection of Personal Information (Act No. 57 of 2003 as amended in 2020) (APPI)** gives you certain rights regarding your personal data. Your rights may include:

- a) If applicable, to request access to your personal data that we hold;
- b) If applicable, to request rectification of your personal data;
- c) If applicable, to request deletion of your personal data; and
- d) If applicable, to object to our processing of your personal data.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

MEXICO

If you are a **resident of Mexico**, the **Federal Law on the Protection of Personal Data Held by Private Parties 2010 (the Law)** gives you certain rights regarding your personal data. You have the right to:

- a) Request access to your personal data that we hold;
- b) Request rectification of your personal data that we hold;
- c) Ask us to erase your personal data in certain circumstances; and
- d) Where applicable, to object to our processing of your personal data.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

PEOPLE’S REPUBLIC OF CHINA

If you are a **resident of the People’s Republic of China**, the **Personal Information Protection Law (PIPL)**, the **Civil Code of the People’s Republic of China (the Civil Code)**, the **Cybersecurity Law (CSL)** and the **Standard GB/T 35273-2020 on Information Security Technology – Personal Information Security Specification (the Specification)** give you certain rights regarding your personal data. You have the right to:

- a) If applicable, to withdraw consent to processing of your personal data;
- b) Request consultation of or copies of your personal data that we hold;
- c) Request rectification or deletion of your personal data;
- d) Where applicable, to restrict or refuse the processing of your personal data;
- e) In certain circumstances, ask for your personal data to be transferred to a third party; and
- f) Request explanation of the rules on the processing of personal information enacted by us.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

PHILIPPINES

If you are a **resident of the Philippines**, the **Data Privacy Act of 2012 (Republic Act No. 10173) and Implementing Rules and Regulations of Republic Act No. 10173 (collectively the “Act”)** give you certain rights regarding your personal data. You have the right to:

- a) Request access to your personal data that we hold;
- b) Ask us to rectify inaccurate personal data or to complete incomplete personal data;
- c) Restrict, suspend, withdraw the processing or order the blocking, removal or destruction of your personal data in specific circumstances;
- d) Object to the processing of personal data, including processing for direct marketing and automated processing or profiling; and
- e) In certain circumstances, receive your personal data in a structured, commonly used and machine-readable format.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

UNITED STATES OF AMERICA

CALIFORNIA

If you are a **resident of California**, the **California Consumer Privacy Act (CCPA)** gives you certain rights regarding your personal data. Where applicable your CCPA rights include:

- a) Opt-out of sales and sharing: to opt-out of sale and sharing of your personal data.
- b) Limit use and disclosure of sensitive personal data: to limit certain uses or disclosures of sensitive personal data to those uses authorized by the CCPA.
- c) Deletion: to request deletion of personal data, subject to certain exceptions.
- d) To know/access: to know what personal data we have collected about them, including the

categories of personal data, the categories of sources from which the personal data is collected, the business or commercial purpose for collecting, selling, or sharing personal data, the categories of third parties to whom we disclose personal data, and the specific pieces of personal data we have collected about them.

- e) Correction: to request correction of inaccurate personal data.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com

TEXAS

Applicable from July 1, 2024, if you are a **resident of Texas**, the **Texas Data Privacy and Security Act (TDPSA)** gives you certain rights regarding your personal data. Where applicable your **TDPSA** rights include:

- a) To know/access: to know what personal data we have collected about you and to have access to such personal data.
- b) Correction: to request correction of inaccurate personal data.
- c) Deletion: to request deletion of personal data, subject to certain exceptions.
- d) Opt-out of sales and sharing: to opt-out of sale of your personal data and the use of your personal data for targeted advertising and profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- e) Data Portability: you may have the right to obtain a copy of the personal data you disclosed to in a portable and, to the extent technically feasible, readily usable format.

If you want to exercise your above-mentioned rights, you can write an e-mail to the following e-mail address: ncj-hotline-privacy@nidec.com