

International University of Japan Compliance Regulations

Enactment: April 1, 2010

Revision: March 29, 2017

Revision: April 1, 2025

(Purpose)

Article 1 The purpose of these Regulations is to contribute to securing the proper and fair operation of the International University of Japan (hereinafter referred to as "IUJ") and enhancing its social trust, by prescribing necessary matters for establishing a system to further promote compliance within IUJ.

(Definitions)

Article 2 The definitions of the terms listed in the following items in these Regulations shall be as prescribed in the respective items:

(1) **Compliance:** Adherence to laws, regulations, etc., by Officers and Staff to ensure the proper and fair execution of IUJ's operations, fostered by an organizational culture based on a firm ethical perspective.

(2) **Compliance Violation:** An act or fact that does not comply with, or is likely not to comply with, laws, regulations, etc.

(3) **Laws, Regulations, etc.:** The Whistleblower Protection Act and laws and regulations related to IUJ's operations, rules and regulations, and other equivalents, as well as the ethics and codes of conduct socially requested for IUJ operations.

(4) **Officers and Staff:** The officers and employees of IUJ (including those in an employment relationship, those engaged in IUJ's operations based on dispatch or other contracts, and those who were employees within one year prior to the date of the report).

(5) **Whistleblowing (Kōeki Tsūhō):** An Officer or Staff member reporting or consulting with a reporting desk about a Compliance Violation committed by an Officer or Staff member, not for the purpose of obtaining illicit gains, inflicting damage on others, or any other wrongful purpose.

(Responsibilities of Officers and Staff)

Article 3 Officers and Staff must deeply recognize the importance of compliance, and at all times execute their operations and duties properly and fairly, with high ethical standards and social common sense.

2 Officers and Staff must not commit Compliance Violations in connection with the execution of the Corporation's operations and duties.

(Chief Compliance Management Officer)

Article 4 The Chief Compliance Management Officer (hereinafter referred to as the "Chief Management Officer") for the promotion of compliance in the Corporation shall be the Chairperson (Rijichō).

2 The Chief Management Officer shall oversee the management of whistleblowing within IUJ and shall aim to establish and enhance the entire institution's whistleblowing management system.

(Compliance General Management Officer)

Article 5 A Compliance General Management Officer (hereinafter referred to as the "General Management Officer") shall be appointed to assist the Chief Management Officer and oversee operations related to the promotion of compliance, and shall be designated by the Chairperson from among the Trustees.

(Compliance Promotion Officer)

Article 6 A Compliance Promotion Officer (hereinafter referred to as the "Promotion Officer") shall be established in the Corporation and its affiliated university, and the President (Gakuchō) and the Head of Departments shall serve as such.

2 The Promotion Officer shall oversee the operations related to the promotion of compliance within their respective departments.

(Preventive Measures)

Article 7 The Chief Management Officer shall, from the perspective of preventing compliance incidents, take necessary measures to enhance the awareness of the importance of compliance among members and increase their understanding of the laws, regulations, etc., that must be adhered to.

2 To execute the responsibility in the preceding paragraph, the Chief Management Officer shall give necessary instructions to the General Management Officer and the Promotion Officers.

(Internal Audit)

Article 8 The Chief Management Officer may, when necessary, conduct an internal audit regarding compliance across the entire academic institution or in specific departments.

2 Internal audits shall be carried out by the Internal Audit Office.

(Relationship with Separately Stipulated Compliance Matters)

Article 9 Compliance matters for which IUJ's regulations specify a corresponding procedure, such as the prevention of harassment, protection of personal information, proper management of public research funds, and prevention of research misconduct, shall be handled in accordance with the relevant regulations.

(Reporting Desk)

Article 10 A reporting desk shall be established in the Internal Audit Office to receive and consult on public whistleblowing within the Corporation.

2 In addition to the reporting desk stipulated in the preceding paragraph, a reporting desk may be established at an external institution, and necessary matters shall be stipulated separately.

3 IUJ shall designate personnel from the Internal Audit Office as engaged individuals to handle reporting tasks, in addition to receiving public whistleblowing as stipulated in paragraph 1. Engaged individuals may also be informed of matters that identify the whistleblower concerning the said tasks.

4 The Chairperson may, whenever necessary, designate staff other than those in the Internal Audit Office as engaged individuals. In this case, the Chairperson shall indicate to the individual being designated as an engaged individual their status through a document or email, etc.

5 Engaged individuals shall perform reporting tasks after confirming their duty of confidentiality regarding matters learned during the reporting tasks that identify the whistleblower, etc.

6 A person who is the principal actor of the reported fact (the subject of the report) or any other person who is clearly closely related to the reporting case, or has been so related, shall not be engaged in the reporting tasks.

(Whistleblowing Response Officer)

Article 11 Among the engaged individuals, the Manager of the Internal Audit Office shall be the officer responsible for the reporting tasks (hereinafter referred to as the "Responsible Officer"). However, if the Manager of the Internal Audit Office is found to be closely related to the reported fact, the Chairperson shall designate another person as the Responsible Officer for that case.

2 The Responsible Officer shall supervise the engaged individuals and oversee the reporting tasks.

(Method of Whistleblowing)

Article 12 Reports to the Corporation may be made by email, telephone, facsimile, written document, or interview.

2 A whistleblower may keep the information that identifies them confidential when making a report.

(Receipt and Reports)

Article 13 An engaged individual who receives a public whistleblowing report at the reporting desk must immediately report this to the Responsible Officer.

2 The Responsible Officer shall report the content (excluding information that identifies the whistleblower if they do not consent) to the Chairperson and the Auditors.

(Prevention of Sharing Outside the Scope)

Article 14 The whistleblower's name and other information that identifies the whistleblower shall be shared only among engaged individuals, unless the whistleblower consents.

2 Information obtained from the investigation of the reported fact (excluding the information in the preceding paragraph) shall be shared only among engaged individuals, the Internal Audit Office, Officers and Staff involved in considering corrective measures, and competent administrative agencies, as necessary.

(Commencement and Notification of Investigation)

Article 15 Engaged individuals shall examine the necessity of conducting an investigation into the facts related to the reported Compliance Violation, and shall conduct an investigation into the reported matter, except when there is a legitimate reason, such as the matter having already been resolved or clearly being unnecessary.

2 If the Chairperson determines that a high level of expertise is required for the investigation, they may seek the opinions of external experts and, if necessary, have them participate in the investigation.

3 Engaged individuals shall notify the whistleblower that the report has been received and whether an investigation is necessary. This shall not apply, however, to anonymous public whistleblowing or when the whistleblower does not wish to be notified.

(Implementation of Investigation)

Article 16 Engaged individuals shall investigate the reported violation through document review, on-site inspection, requests for reports and explanations, and other appropriate methods.

2 Engaged individuals may request the person being investigated to submit relevant documents and explain the facts.

3 The person being investigated must comply with the request in the preceding paragraph, except when there is a legitimate reason.

4 If the Responsible Officer deems it necessary for the implementation of the investigation, they may, with the permission of the Chairperson, attend the Board of Trustees or other meetings, or inspect their minutes.

(Matters to be Observed)

Article 17 Engaged individuals and others involved in the investigation must observe the following matters in the performance of their duties:

(1) Not infringing upon the rights or legitimate interests of the person being investigated or a third party.

(2) Not causing a serious impediment to the execution of operations in the department or by the person being investigated.

(3) Always maintaining an impartial and unbiased attitude and conducting investigations based on facts.

(4) Maintaining the confidentiality of information that identifies the Officer or Staff member who made the whistleblowing, etc., except when the person consents.

(5) Not disclosing facts learned through their duties to others without legitimate reason, and this shall remain the same even after leaving their position.

2 IUJ may impose disciplinary action, etc., on those who violate the provisions of the preceding paragraph, based on the Corporation's Rules of Employment and related regulations, etc.

(Corrective Measures and Notification, etc.)

Article 18 The Responsible Officer shall appropriately report the progress of the investigation to Chairperson after it commences, and shall immediately report the results to the President and the Auditors upon its conclusion.

2 If the existence of a Compliance Violation is revealed, the Chairperson must take corrective measures and preventative measures against recurrence without delay and report them to the Board of Trustees.

3 If the measures in the preceding paragraph are taken, the Responsible Officer shall notify the whistleblower related to the said measures of the content of the measures. This shall not apply, however, to anonymous whistleblowing or when the whistleblower does not wish to be notified.

4 When giving the notification stipulated in the preceding paragraph, the Responsible Officer must be careful not to infringe upon the honor, privacy, etc., of the person who was the subject of the report or those who cooperated in the investigation.

5 If the President deems it necessary, they shall report the content of the investigation and corrective measures, etc., to the relevant administrative agencies.

(Protection of Whistleblowers)

Article 19 The Corporation shall not dismiss, terminate a dispatch contract, reduce wages, demote, or otherwise disadvantage a whistleblower for the reason of making a report. However, this shall not apply if the whistleblower made the report for a wrongful purpose.

2 The Corporation shall not search for who the whistleblower is or who cooperated in the investigation regarding the subject matter.

3 Officers and Staff of the Corporation shall not treat a whistleblower disadvantageously or harass them for the reason that another person made a report.

4 The Corporation must take appropriate steps to ensure that the whistleblower's workplace environment does not worsen for the reason of making a report.

(Disciplinary Action, etc.)

Article 20 If a Compliance Violation is revealed, IUJ shall impose disciplinary action, etc., on the person involved in the violation, based on IUJ's Rules of Employment and related regulations, etc.

(Mitigation Measures)

Article 21 If a person involved in a Compliance Violation voluntarily reports or declares it before the Internal Audit Office commences its investigation, their penalty may be waived or mitigated.

(Application Mutatis Mutandis to Reports Not Falling Under Whistleblowing)

Article 22 Reports from individuals other than the Officers and Staff of the University shall be handled in accordance with these Regulations.

(Implementation Regulations)

Article 23 In addition to what is prescribed in the Whistleblower Protection Act and these Regulations, necessary matters for the implementation of these Regulations shall be determined by the Chairperson.

Additional Regulations

These Regulations shall take effect from April 1, 2010.

Additional Regulations

These Regulations shall take effect from March 29, 2017¹⁰⁵.

(Amendment due to change of regulation name to comply with the Whistleblower Protection Act and clarification of reported facts, etc.)

Additional Regulations

These Regulations shall take effect from April 1, 2025.

(Amendment related to the development of the internal control system and renaming from International University of Japan Regulations on the Protection of Whistleblowers to International University of Japan Compliance Regulations)