

# WHISTLEBLOWING POLICY

## 1. INTRODUCTION

DENSO INTERNATIONAL ASIA CO., LTD. ("Company") is committed to conduct businesses with the highest standard of integrity and transparency. The Company also adheres to the principles of good corporate governance and is trying best effort to combat corruption and other misconducts in the Company.

## 2. APPLICATION

This Policy is applicable to any individual, company or organization dealing with the Company which includes customers, suppliers, distributors, business contacts, agents, advisers, stakeholders, etc. ("Whistleblower").

## 3. POLICY STATEMENT

3.1 This policy aims to establish an effective communication channel that enable the Whistleblower to report to the Company the actual, attempted or suspected unethical behaviors, misconducts and/or violation of laws or regulations directly or indirectly committed by the Company's directors or employees ("Improper Conduct").

3.2 Improper Conduct shall include the following:

- (1) Fraud and Corruption
- (2) Providing False Claim
- (3) Abuse of Power
- (4) Conflict of Interest
- (5) Violation of laws or regulations

3.3 The Company expects the Whistleblower to act in good faith with a reasonable belief that the information or report provided to the Company is true, correct, free from malicious intent. This Policy is not intended as a channel for taking up any personal grievances.

## 4. REPORTING PROCEDURE

4.1 The Whistleblower is advised to make a report to the Company in writing and to provide sufficient details in the form as designated by the Company which include the following:

- (1) Description of Improper Conduct;
- (2) Name of individuals who have committed or are involved in the Improper Conduct;
- (3) Supporting documents or evidence, if any;
- (4) Name, address, organization and contact information of the Whistleblower. This is to facilitate the Company to obtain further information or evidence in order to proceed with the investigation into the Improper Conduct. The Company shall keep strict confidential on the Whistleblower's identity details to accord protection to the Whistleblower.

4.2 The report of Improper Conduct shall be made through either of the following channels.

| Reporting Method | Channel                            |
|------------------|------------------------------------|
| E-mail           | ap_diat_legalhelpline@ap.denso.com |

**5. WHISTLEBLOWER PROTECTIONS**

- 5.1 The Company shall, to the extent reasonably practicable, take all means to protect the confidentiality of identity of the Whistleblower and the contents of Improper Conduct reported to the Company and shall comply with any statutory requirements in force.
- 5.2 The Whistleblower is responsible to ensure that the disclosure of Improper Conduct is made in good faith and free from any malicious intent. The Company shall also take all reasonable efforts to protect the Whistleblower from detrimental action or retaliation for a good faith disclosure of Improper Conduct.
- 5.3 The Company does not have power to provide immunity from legal actions or proceedings which beyond the Company's reasonable control.
- 5.4 The protection of Whistleblower under this Policy shall not be available if the Whistleblower participated in the Improper Conduct or wilfully discloses a false statement; or makes a report of Improper Conduct with malicious intent. The Company reserves its rights to take appropriate action including legal action against the false or malicious report made by Whistleblower.

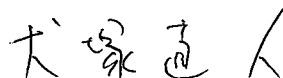
**6. HANDLING OF IMPROPER CONDUCT REPORT**

- 6.1 Upon receiving the report on Improper Conduct, the Company shall provide the Whistleblower with an acknowledgement of receipt of the report.
- 6.2 The Company will inform the Whistleblower of the Company's decision.
- 6.3 Any anonymous report may not be considered and the Company reserves its right to determine whether the investigation of the any report should be carried out or not. The Company shall not be liable for any acts or omissions regarding such determination.

**7. EFFECTIVENESS**

This Policy shall become effective from the announcement date hereof.

Announced on 1 April 2021



Naoto Inuzuka  
CEO & President