



HITACHI
Inspire the Next

Hitachi's Expectations of Business Partners

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Created by Compliance Division, Hitachi, Ltd.

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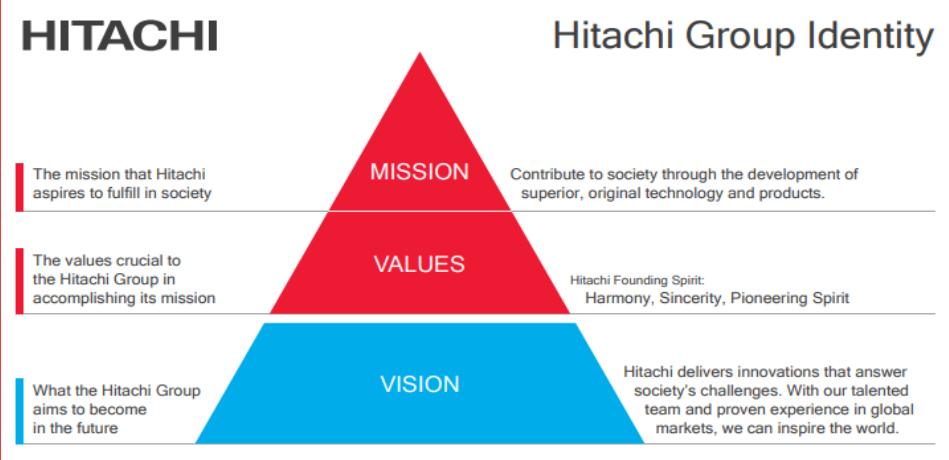
Speak up and Report a Concern

Introduction

Hitachi is committed to doing business ethically and legally and seeks to work with business partners who operate to the highest standards of integrity and quality.

Hitachi expects business partners to adhere to behaviors consistent with the **Hitachi Group Code of Ethics and Business Conduct** and applicable laws and regulations.

Hitachi also expects business partners to understand the importance of aligning with Hitachi's Mission, Values and Vision and to conduct business in a manner that does not cause adverse effects on people and our planet.



As a Hitachi business partner, Hitachi expects you to commit to and act in accordance with the **Hitachi Group Code of Ethics and Business Conduct** and communicate these expectations to your employees, contractors, and business partners when working with or on behalf of Hitachi.



Business Ethics & Compliance

Hitachi is committed to complying with applicable laws and regulations and upholding the highest standards of business ethics and conduct. As a Hitachi business partner, you are expected to promote transparency and accountability in your business activities, including the implementation of effective processes and procedures to:

Prevent Bribery and Corruption and comply with applicable anti-bribery and anti-corruption laws and regulations. Refrain from offering or accepting anything of value to keep business, secure business, or gain an unfair advantage. Refrain from making facilitation payments on behalf of Hitachi unless there is an immediate threat to life, safety, security, or freedom. If you make a payment under these circumstances, notify Hitachi immediately.

Give and Receive Gifts and Entertainment responsibly. Refrain from offering or receiving gifts and entertainment on Hitachi's behalf that are contrary to local laws or could be perceived as unduly influencing a business decision. Do not provide Hitachi with cash or cash-equivalent gifts.

Conduct your business transactions with transparency and accurately record and classify transactions in your company's accounting books and records. Do not keep hidden financial accounts or unrecorded funds. Report relevant information in accordance with applicable laws and regulations.

For Security Trade Control, comply with national and international trade compliance laws, export control regulations, economic sanctions, and customs laws that control international transactions of products and services. Obtain the required export licenses before proceeding with any export and comply with the license terms or any exemption requirements.

Compete Fairly and comply with antitrust and competition laws in all countries in which you do business with, or on behalf of, Hitachi. Refrain from entering into an agreement with a competitor to divide markets or customers, fix prices, manipulate the competitive bidding process, or exchange or discuss Hitachi's confidential, sensitive information. Refrain from abusing or exploiting a dominant market position to secure unfair terms or to unfairly consolidate or strengthen market power.

Prevent Money Laundering and comply with anti-money laundering and anti-terrorism laws and regulations. Avoid activities associated with criminal acts, including money laundering or terrorist financing.

Identify and Manage Conflicts of Interest and avoid situations in which personal interests, outside activities, financial interests, or relationships conflict or appear to conflict with the interests relating to Hitachi activities. Do not allow business dealings with, or on behalf of, Hitachi to be influenced by personal considerations or relationships.

Conduct Due Diligence on your business partners and mitigate risks discovered during due diligence before they begin working for or on behalf of Hitachi. Monitor their performance to ensure they meet your and Hitachi's expectations.

Health, Safety and Environment

Hitachi works to create a healthy, safe, and secure work environment. As a Hitachi business partner, you are expected to:

Understand and follow Hitachi's health and safety requirements when working with or on behalf of Hitachi.

Comply with applicable laws and regulations regarding health and safety.

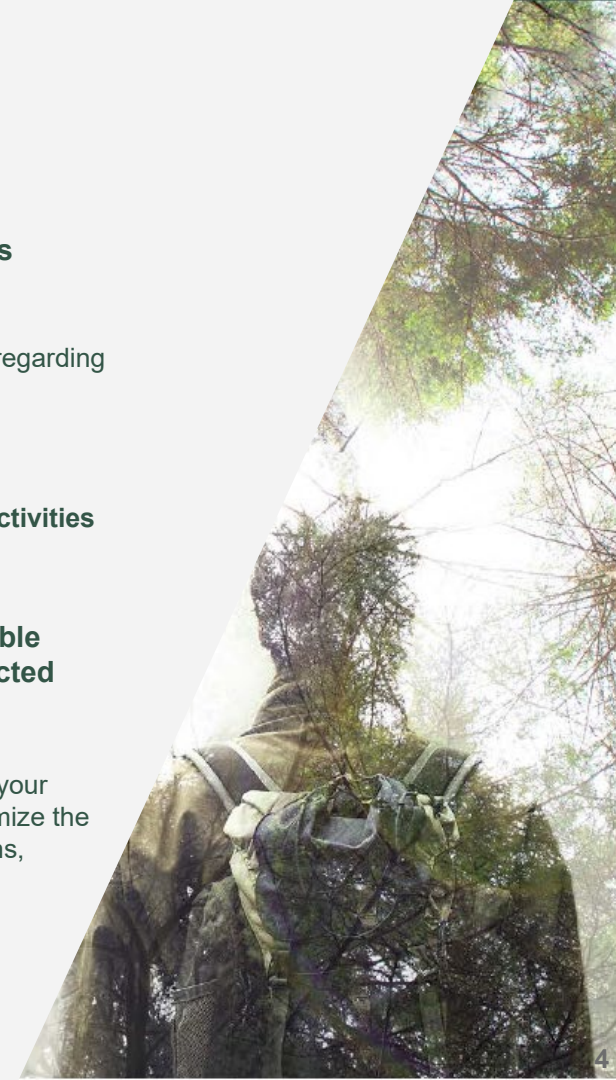
Develop a safe, secure, and healthy workplace for everyone involved in Hitachi business activities.

Continually be involved in health and safety activities to prevent occupational injuries and sickness.

Hitachi will address environmental issues and achieve a higher quality of life and a sustainable society through its Social Innovation Business. As a Hitachi business partner, you are expected to:

Understand and follow environmental laws and regulations that apply to Hitachi business activities.

Understand the direct and indirect effects of your business activities on the environment and minimize the adverse effects such as carbon dioxide emissions, pollution, or waste.





Human Rights

Hitachi conducts business in a way that supports and respects the human rights of all those involved in Hitachi's business activities and follows international conventions on human rights and labor laws and national laws and regulations. As a Hitachi business partner, you are expected to:

Respect human rights, abide by international standards, and avoid causing or contributing to negative human rights impacts.

Comply with applicable laws, rules, and legal requirements for abolishing slavery and all forms of forced or compulsory labor.

Not permit child, forced, or trafficked labor.

Comply with Hitachi's commitment to human rights, uphold the human rights of workers, and treat them with dignity and respect.

Promote equal employment opportunities. Do not discriminate against anyone involved in your business activities.

Respect employees' freedom of association and the right to collective bargaining.

Confidential Business Information and Personal Data

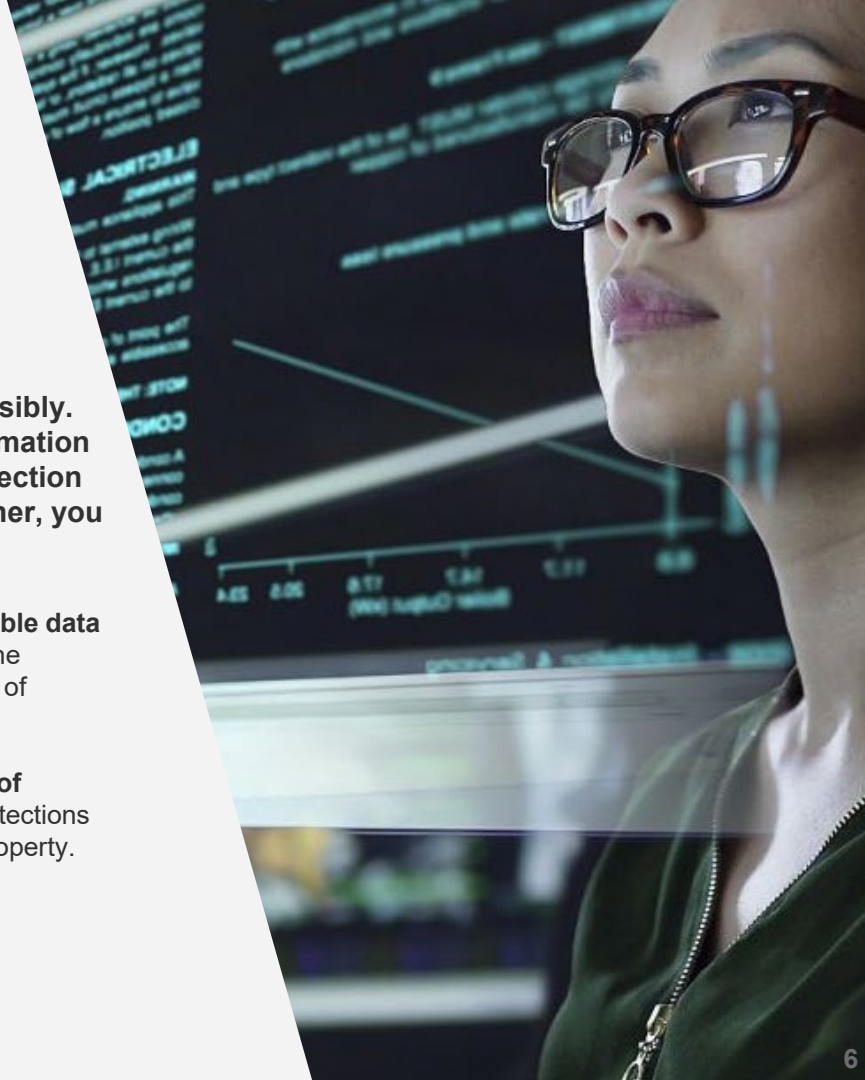
Hitachi is committed to handling confidential business information responsibly. Hitachi takes precautions to protect Hitachi's and business partners' information from unauthorized access and disclosure and follows applicable data protection laws when handling employees' personal data. As a Hitachi business partner, you are expected to:

Handle Hitachi's confidential business information with care, protecting it from attacks, disclosure, or misuse.

Protect non-public information of Hitachi by adopting industry best practices.

Observe and adhere to all applicable data privacy laws and regulations on the collection, processing, and securing of Hitachi employees' personal data.

Respect the intellectual property of Hitachi and provide appropriate protections before using Hitachi's intellectual property.



Speak up and Report a Concern

Hitachi encourages everyone who works for or represents Hitachi to speak up whenever they have a concern or see something wrong. As a Hitachi business partner, you are expected to:

Create a speak-up environment in your organization that does not tolerate any form of retaliation against individuals who raise concerns in good faith or participate in investigations.

Have effective channels available for your employees, contractors, and business partners to raise concerns regarding violations, or potential misconduct, unethical behavior, or unsafe actions.

Have adequate processes in place to ensure that concerns are taken seriously, evaluated and managed appropriately, and treated with the utmost confidentiality.

Contact Hitachi to report any violations or suspected unethical or potentially harmful acts involving Hitachi's business activities. You may inform a member of Hitachi's management or use the Hitachi Global Compliance Hotline, which is available 24/7 and allows anyone to remain anonymous, where permitted by law.

Share the contact details of the Hitachi Global Compliance Hotline with your employees, contractors, and business partners who work for or on behalf of Hitachi. The contact details are provided below.

To reach the Hitachi Global Compliance Hotline:

 Visit hitachi.ethicspoint.com

 Call toll-free. Locate the number for your country on hitachi.ethicspoint.com




Business Partners are external companies, entities, organisations or individuals with whom Hitachi Rail has, or may consider having, a business transaction or relationship.

This Addendum imposes additional expectations and requirements on business partners that supply to Hitachi Rail.

Hitachi Rail Addendum

Internal Management Systems



Hitachi Rail expects business partners to comply with laws and regulations and demonstrate internal management systems that support this:

Establish processes and governance to identify, monitor, understand, and **comply with applicable laws, regulations, and customer requirements**.

Violations of laws or regulations may result in termination of the business relationship with Hitachi Rail, as well as any other legal and contractual remedial actions available to Hitachi Rail.

Establish processes to **identify** legal, regulatory, environmental, health and safety, and ethical **risks** associated with your labour practices and operations.

Implement periodic self-evaluations or audits to ensure conformity with legal and regulatory requirements, and customer contract requirements including those related to environmental, social and governance (ESG) responsibility.

Create and maintain accurate and truthful documents, books, and records to: prevent fraud; ensure legal, financial, and regulatory compliance; conformity with customer requirements, and adopt appropriate safeguards to protect privacy, and confidential and commercially sensitive information.

Establish processes to **communicate and flow-down expectations** to your own workforce and suppliers, and monitor their compliance.

Provide evidence of your internal management systems and self-evaluations or audits when requested to do so by Hitachi Rail.



Product Quality and Safety

Ensure sufficient product design safety and sell products with an awareness of your responsibility as a manufacturer. Product safety shall be ensured in compliance with applicable laws and regulations.

Embrace opportunities for **continuous improvements** facilitated and promoted **within your quality management systems**.

Intellectual Property & Confidential Business Information

Respect and protect intellectual property rights and confidential business information. Transfer and use of technology and know-how must be conducted in a way that does not infringe on intellectual property rights, and information of customers and suppliers must be safeguarded in accordance with laws and regulations, and adequate information security controls.

Privacy & Personal Data

Any personal data (whether relating to employees of Hitachi Rail or otherwise) that your Company controls or processes, will be collected, stored, processed, transmitted, and shared **in accordance with laws and regulations related to privacy and personal data protection, and information security.**

Whistleblowing

Maintain a programme to ensure the protection of supplier and employee whistleblowers, unless prohibited by law.

Environment



Establish greenhouse reduction goals, and support Hitachi Rail regarding sustainability and carbon initiatives. Please be aware of our [Hitachi Group Sustainable Procurement Guidelines](#).

Identify the environmental impact of manufacturing activities and minimize the adverse effects on the community, the environment, and natural resources while safeguarding public health and safety. Please be aware of our [Hitachi Group Green Procurement Guidelines](#).

To conserve biodiversity and ecosystems that serve as the foundation for the survival of both humanity and business, **procure raw materials and products with an awareness of their impact.**

Adopt policies and conduct due diligence on the sources and chains of custody for minerals, such as tin, tantalum, tungsten, and gold contained within its manufactured products. Due diligence shall be undertaken to reasonably assure the procurement of minerals is consistent with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas or equivalent due diligence frameworks.