

Supplier Consultation Desk

As one aspect of the Komatsu Group's compliance activities, the Group has established a Supplier Consultation Desk. The purpose of this scheme is to have suppliers consult/report problems that should be rectified by the Komatsu Group—primarily in relation to the Act against Delay in Payment of Subcontract Proceeds, Etc. to Subcontractors (hereinafter referred to as the Act)—from the perspective of maintaining appropriate procurement activities, and to take necessary corrective measures at an early stage in the occurrence of such problems.

Where Komatsu Group officers or employees have (or are suspected to have) made compliance violations in their procurement activities, please make a consultation or report according to the following procedure. We decline to accept reports with regard to personal defamation or name calling, etc.

1. People who can use the consultation desk

As a general rule, a corporate officer of the supplier must make a consultation or report reflecting the collective opinion or consensus of the organization. Although consultations and reports based on personal judgement are also accepted, there are some cases in which the organizational cooperation of the supplier (from which the report came) in investigating the facts surrounding the report cannot be obtained, and the investigation may not be completed.

2. Matters for which a consultation or report can be made

- (1) Violations of the Act, or other laws that apply to the relevant transaction
- (2) Acts that go against the three key challenges in establishing future-oriented trade practices, as set out by Japan's Ministry of Economy, Trade and Industry (METI)
- (3) Act that have a major negative impact on maintaining a long-term trusting relationship

3. How to make a consultation or report

Please send an e-mail to the following e-mail address in the prescribed format.

Komatsu Head Office Compliance Office: supplier_soudan_comp@global.komatsu

Company name	
Customer code	
Name	
Department	
Job title	
Contact details	E-mail address, cellphone number, etc.
Details of inquiry	Please give specific details indicating who (i.e. name and department of Komatsu Group employee) did what, when and where.

4. How consultations and reports are handled

- (1) Based on the content of the consultation or report, an investigation of the facts will be conducted by an impartial, neutral department, with the exclusion of the relevant procurement division. In conducting this investigation, we may request the provision of materials or data by the supplier making the report in order to substantiate the facts.
- (2) Upon completion of the investigation, a judgement will be made—based on discussions with internal and external experts—as to whether or not a violation of the rules has actually taken place. Where necessary, corrective measures and/or preventive measures (to prevent reoccurrences) will be taken. As a general rule, the supplier making the report will be notified of details of such measures.

5. Prohibition of disadvantageous treatment

The Komatsu Group firmly promises that the procurement division will not treat suppliers who make reports disadvantageously in the future for the reason that they made a consultation or report.

Established: April 1, 2014
Revised: December 19, 2018