

## Basic Regulations on Compliance at Osaka University

\* Please note that this document is a translation of the Japanese version, and should only be used as a reference.

Chapter I: General Provisions (Article 1 to Article 4)

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Supplementary Provisions

### Chapter I: General Provisions

(Purpose)

Article 1:

The purpose of these Regulations is to stipulate basic matters relating to compliance issues of National University Corporation Osaka University (“University Corporation”) pursuant to Article 2 of Osaka University Operational Procedures to ensure that the staff of the University Corporation perform their duties with fairness and integrity and maintain society’s trust in the University Corporation, thereby contributing to the sound operation of Osaka University (“University”).

(Definitions)

Article 2:

1. The term “Compliance” as used herein shall mean complying with all applicable laws and regulations, as well as regulations of the University Corporation and ethical codes and other norms set specifically for research, educational and medical activities (“Laws and Regulations”).
2. The term “Compliance Problem” as used herein shall mean the failure or alleged failure of the Directors and Staff of the University Corporation to comply with Laws and Regulations.
3. The term “Division” as used herein shall mean any of the Administration Bureau, Schools/Faculty, Graduate Schools, University Libraries, University Hospitals, Research Institutes, Joint-Use Facilities, National Joint-Use Facilities, and other relevant organizations of the University.
4. The term “Directors and Staff” as used herein shall mean individuals who are paid wages or compensation by the University Corporation, whether under an employment contract with the University Corporation or not, including, but not limited to, the board members and administrative and academic staff of the University Corporation.

(Application of Other Regulations)

Article 3:

Notwithstanding the provisions stated herein, other regulations on Compliance promotion and other related issues shall prevail if stipulated otherwise therein.

(Obligations of Directors and Staff)

Article 4:

Directors and Staff shall fully recognize the importance of Compliance and perform their duties with fairness and integrity to contribute to the development of education and research.

## Chapter II: Organization for Compliance Promotion

(Chief Compliance Officer)

Article 5:

The University Corporation shall have a Chief Compliance Officer responsible for making final decisions on important matters concerning Compliance promotion and other related issues, and shall appoint the President of the University to the post.

(Compliance Administrator)

Article 6:

The University Corporation shall have a Compliance Administrator responsible for supervising Compliance promotion activities under the Chief Compliance Officer, and shall appoint the Executive Director in charge of risk management to the post.

(Compliance Promotion Officers)

Article 7:

1. Each of the Divisions shall appoint the Dean/Director thereof as Compliance Promotion Officer, while the Administration Bureau shall appoint Executive Directors, each responsible for a specific area of operation, as Compliance Promotion Officers.
2. Compliance Promotion Officers shall work to promote Compliance in their respective Divisions following the instructions of the Compliance Administrator.

## Chapter III: Compliance Promotion Committee

(Compliance Promotion Committee)

Article 8:

The University Corporation shall have a Compliance Promotion Committee (“Committee”).

(Deliberation by the Committee)

Article 9:

The Committee shall deliberate the following matters:

- (1) Development of basic policies for Compliance promotion and general control over them
- (2) Development of a structure for operation of the organizations involved in Compliance promotion
- (3) Raising of awareness of Compliance promotion
- (4) Other important matters concerning Compliance promotion

(Committee Members)

Article 10:

1. The Committee shall consist of the following members:
  - (1) Chief Compliance Officer
  - (2) Compliance Administrator
  - (3) Executive Directors other than the Compliance Administrator
  - (4) Other individuals deemed necessary by the Committee
2. The Committee members stated in (4) in the preceding Paragraph shall serve the term of two (2) years, provided that any individual appointed to be a member midway through the term to fill a vacancy shall serve the rest of the original two-year period.
3. The Committee members stated in the preceding Paragraph may be reappointed.

(Chairperson)

Article 11:

1. The Committee shall have a Chairperson and shall appoint the Chief Compliance Officer to the post.
2. The Chairperson shall convene and preside over Committee meetings.

(Vice Chairperson)

Article 12:

1. The Committee shall have a Vice Chairperson and shall appoint the Compliance Administrator to the post.
2. The Vice Chairperson shall assist the Chairperson and, should the Chairperson become unable to perform the role, shall act on his or her behalf.

(Attendance of Non-Members at Committee Meeting)

Article 13:

The Committee may allow any non-members to attend a Committee meeting to give explanation or offer opinions if deemed necessary.

Chapter IV: Handling of Compliance Problems

(Reporting and Whistleblowing on Compliance Problem)

Article 14:

When any of the Directors and Staff has recognized the occurrence or alleged occurrence of a Compliance Problem, he or she shall immediately report to the Compliance Promotion Officer of the Division with which he or she is affiliated (or to the Compliance Administrator if the Director or Staff member is the Compliance Promotion Officer) or to the point of contact for whistleblowers specified in the regulations applied to said Compliance Problem.

(Recognition of Occurrence of Compliance Problem)

Article 15:

1. When the Compliance Promotion Officer has recognized the occurrence or alleged occurrence of a Compliance Problem upon receipt of the report stated in Article 14 or if the Compliance Promotion Officer has detected the occurrence thereof himself or herself, he or she shall immediately report to the Executive Director responsible for the area of operation in which the Compliance Problem has occurred.
2. Upon receipt of the report on the occurrence of a Compliance Problem pursuant to the preceding Paragraph, the Executive Director shall report to the Compliance Administrator and investigate the reported problem in cooperation with the Compliance Administrator.
3. When the Compliance Administrator has recognized the occurrence of a Compliance Problem as a result of an investigation conducted pursuant to the provision of the preceding Paragraph, he or she shall report the problem to the Chief Compliance Officer without delay.

(Corrective Measures)

Article 16:

Upon receipt of the report on a Compliance Problem pursuant to Paragraph 3 of Article 15, the Chief Compliance Officer shall immediately take corrective measures as well as measures necessary to prevent recurrence of the same problem.

Chapter V: Miscellaneous Provisions

(Administrative Procedures)

Article 17:

The General Affairs Division, Department of General Affairs shall be responsible for administrative procedures for Compliance promotion and other related issues.

(Miscellaneous Provision)

Article 18:

Matters concerning Compliance promotion and other related issues not specified herein shall be set forth separately.

Supplementary Provision

These Regulations shall come into effect on July 19, 2017.