

Privacy and Consent Notice

Introduction

PG Ethics is a confidential reporting system operated on behalf of Hitachi ABB Power Grids by Navex Global, Inc. and provided by Hitachi ABB Power Grids to allow people to ask questions or to report suspected violations of law or the Hitachi ABB Power Grids' Code of Conduct. In relation to the data you provide through PG Ethics, Hitachi ABB Power Grids Ltd and its [subsidiary companies](#) are the data controller.

Use of PG Ethics is entirely voluntary as you may use various other channels to report your concern (such as reporting to our management or by sending an email to our Head of Integrity or our Legal & Integrity department). Only to the extent that you feel unable to use those channels, we recommend you use PG Ethics.

In certain countries, Hitachi ABB Power Grids may only accept reports through PG Ethics that relate to financial, accounting, auditing or bribery matters. If your concern pertains to a matter that, under local law, may not be accepted by Hitachi ABB Power Grids through PG Ethics, you will need to contact Hitachi ABB Power Grids' Legal & Integrity department to report the matter.

Please be aware that the information you provide about yourself, your colleagues, or any aspect of Hitachi ABB Power Grids' operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual. Hitachi ABB Power Grids has a strict non-retaliation policy for any report made in good faith, even if it later turns out to be incorrect. However, knowingly providing false or misleading information may result in consequences including disciplinary proceedings up to and including termination.

Collection and use of personal data

Unless you choose to remain anonymous, you will be asked to provide the following information:

- First and last name
- Email address
- Telephone number

In addition, we will ask you to provide the name and title of all individuals you are reporting on and a description of the suspected legal or compliance violation (including attachments that support your report).

We also request information about your location and the location where the event took place so that any applicable local laws can be applied in gathering the information and undertaking any investigation.

The information you provide will be treated confidentially to the extent permitted by law. We encourage you to identify yourself to facilitate any necessary follow up.

Once you have completed your report, you will be provided with a Report Key and you will be asked to create a password. You will need both in order to access the matter which you have reported either by returning to PG Ethics or by contacting the Call Center.

Unless you have indicated otherwise or unless required by law, the reports filed through PG Ethics will only be used and reviewed by those individuals who need to access the information to fulfill their professional duties. PG Ethics reports are forwarded by Navex to the Office of Special Investigations at Hitachi ABB Power Grids' headquarters for further review.

Our Office of Special Investigations will evaluate the information you provide and conduct an investigation where required. Your cooperation and assistance in that investigation may be necessary. If an investigation indicates that a violation of our Code of Conduct or applicable laws or regulations has occurred, Hitachi ABB Power Grids will take such action as it considers appropriate in the circumstances. Depending on the nature of the matter, it may not be possible for Hitachi ABB Power Grids to share the result of its investigation with you.

Please note that, in some circumstances, individuals you identify through PG Ethics may be informed about the fact that a report has been made. To the extent reasonably possible, Hitachi ABB Power Grids will not identify you. All individuals you identify will have the right to respond to or correct information you report.

Sensitive personal data

Please do not provide any data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a person's sex life or sexual orientation, about yourself or another person, unless this information constitutes a key element of your report.

For what purposes do we process personal data?

We process your personal data

- To administer PG Ethics and assess and follow-up on submissions to PG Ethics;
- To investigate alleged violations;

- To take any necessary follow up action upon the completion of an investigation;
- To create anonymous reports for Hitachi ABB Power Grids' management.

Legal basis for processing

In the context of operating PG Ethics, we rely on the following legal bases for the processing of personal data:

- Your consent to process the report submitted by you (this relates to personal data that identifies you as reporter);
- Our legitimate interest in investigating your report and taking any follow up actions upon the completion of such investigation (this relates to personal data that identifies the individuals you are reporting on). Our legitimate interest is making sure that we are aware of and respond to all suspected violations of applicable law/regulations and our Code of Conduct and to protect our brand and reputation.

In some cases, we also process personal data in PG Ethics for compliance with a legal obligation to which we are subject and/or because such processing is necessary for the establishment, exercise or defence of legal claims.

Who has access to personal data?

Personal data is collected for the purposes referred to above (or for secondary purposes where it is closely related, for example such as storing it) and will only be shared on a strict need-to-know basis with:

- Designated Hitachi ABB Power Grids staff, responsible for administering PG Ethics;
- Hitachi ABB Power Grids staff responsible for investigating alleged wrongdoings reported through PG Ethics and/or for taking the required measures to follow up any investigation, such as instituting disciplinary proceedings or legal proceedings;
- Public authorities, government, regulatory or fiscal agencies where it is necessary to comply with a legal or regulatory obligation to which the relevant Hitachi ABB Power Grids company is subject to as permitted by applicable local law;
- Navex, Global Inc. who operates PG Ethics on our behalf;
- Statutory auditors, forensic auditors and/or external legal counsel engaged by Hitachi ABB Power Grids.

Storage and cross-border transfer of personal data

Calls and on-line reports to PG Ethics are received on behalf of Hitachi ABB Power Grids by Navex Global, Inc. Navex is based in the United States with servers located in various countries.

The access rights detailed above involve the transfer of personal data in various jurisdictions (including jurisdictions outside the European Union) in which Hitachi ABB Power Grids operates. Hitachi ABB Power Grids will process your personal data in accordance with applicable law in your jurisdiction. Transfers of personal data within the Hitachi ABB Power Grids group are governed by standard data protection clauses adopted by the European Commission. **Transfers of personal data to Navex are also governed by standard data protection clauses adopted by the European Commission.**

Security

We use appropriate technical and organizational measures to protect personal data. At Hitachi ABB Power Grids, we implement appropriate access controls so your personal data will only be accessible on a need-to-know basis.

For more information about the security measures applied by Navex Global, Inc. on PG Ethics, please read the [privacy statement of Navex Global, Inc.](#)

Retention of personal data

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

For the personal data you provide via PG Ethics, (a) any information submitted that is not needed for the investigation of any incident may be archived, as permitted under applicable law; (b) in addition, once we have completed any investigation, all information you submitted will be archived as legally required.

Controlling your personal data

Hitachi ABB Power Grids provides you with the ability to make sure your personal data is accurate and up to date. If at any time you would like Hitachi ABB Power Grids to rectify, erase or restrict the processing of your personal data, or if you would like to obtain confirmation whether or not your personal data is processed by Hitachi ABB Power Grids, access your personal data, exercise

your right to data portability or withdraw your consent to the processing of your personal data, please submit a form via <https://www.hitachiabbpowergrids.com/privacy>.

How you can contact us and complaints

If you have any questions or concerns regarding how your personal data is processed for the purposes of PG Ethics, please contact our privacy officer via privacy@hitachi-powergrids.com. Alternatively, you have the right to lodge a complaint with a supervisory authority competent for your country.

Changes to this Privacy and Consent notice

This Privacy and Consent notice may be changed over time. This Privacy and Consent notice was last updated on **May 20, 2021**.