

Overview of the Whistleblowing Section for the Code of Sustainable Procurement

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August 2024



【Purpose of This Document】

- At Expo 2025 Osaka, Kansai, (hereinafter referred to as “Expo 2025”) a Whistleblowing Section has been established and is currently in operation to receive reports related to the Code of Sustainable Procurement.
- However, some may find the Whistleblowing Section difficult to understand, feel unsure because they are using it for the first time, or think the Whistleblowing Form is too complicated to complete or submit.
- To make the Whistleblowing Section more user-friendly, this document explains—from the perspective of potential whistleblowers—what types of issues can be reported, what information is required when reporting, and how the procedures progress.



Table of Contents

- What is the Whistleblowing Section?
- Scope of Reports Handled
- Who Can Report
- Reporting Period and Method
- Required Information for Reporting
- Report Processing Procedure
- Additional Notes
- Appendix: Notes for Completing the Whistleblowing Form



What is the Whistleblowing Section?

- The Whistleblowing Section is a system for receiving and responding to reports concerning non-compliance with the Code of Sustainable Procurement.
- The Whistleblowing Section facilitates dialogue between the "parties" (e.g., businesses possibly in non-compliance and individuals negatively affected), aiming for resolution based on mutual agreement.

※Note: Dialogue may not take place in cases where the parties cannot be identified, such as in the case of third-party reports.



Scope of Reports Handled

- The Whistleblowing Section established by the Japan Association for the 2025 World Exposition (hereinafter referred to as the “the Organizer of the World Expo 2025”) handles reports that meet both of the following conditions:
 - ✓ **The report related to the Goods, services and Licensed merchandise procured by the Organiser of the World Expo 2025**, including those procured by Sponsors and Pavilion Organisers in relation to the Expo 2025 and
 - ✓ **The report related to non-compliance with the Code of Sustainable Procurement**, including facts that may indicate non-compliance, such as those arising within the supply chain.
- However, even if a report meets the above conditions, the Organiser of the World Expo 2025 may decide not to initiate the process if the report is clearly inappropriate—for example, if it is made with malicious intent such as defamation, or if the matter is already under dispute in another grievance mechanism involving substantially the same issue.
- The Organiser of the World Expo 2025 will ensure objectivity and fairness in such decisions by seeking advice from external experts, including the Advisory Group on Whistleblowing, as necessary.



Scope of Reports Handled

- Examples of applicable cases handled by the Whistleblowing Section:
 - ✓ Wages paid to employees engaged in the manufacturing of goods procured by the Organiser of the World Expo 2025 are below the legal minimum wage.
 - ✓ Personal information of employees engaged in providing services to the Organizer of the World Expo 2025 has been leaked by the service provider.
 - ✓ Foreign technical interns involved in the production of licensed merchandise for Expo 2025 are working without undergoing proper legal employment procedures.
 - ✓ Waste generated during the manufacturing of goods procured by Pavilion Organisers in relation to Expo 2025 has been illegally dumped.
 - ✓ Employees engaged in the manufacturing of goods procured by Pavilion Organisers in relation to Expo 2025 are working overtime beyond the legal limits.



Reports Handled by the Whistleblowing Section

(Examples of reports that are NOT subject to handling)



- Please note that the following types of reports do **NOT** fall within the scope of the Whistleblowing Section:
 - ✓ Reports concerning the manufacturing or distribution of goods and services procured by national or local governments.
 - ✓ Reports concerning the harvesting of raw materials used in products manufactured by companies that have procurement contracts with the Organiser of the World Expo 2025, but the products are not supplied to the Organiser.
 - ✓ Reports on the working conditions of employees of companies that have procurement contract with the Organiser of the World Expo 2025, but these employees are not engaged in providing services to the Organiser.
 - ✓ Reports seeking improvements of industry-wide matters such as wage levels



Who can report

- The following individuals or groups are eligible to submit a report to the Whistleblowing Section:
 - ✓ Parties (individuals, groups, or communities) that have been negatively impacted as a result of non-compliance with the Code of Sustainable Procurement.
 - ✓ Parties (individuals, groups, or communities) that are highly likely to be negatively impacted in the future as a result of such non-compliance.
 - ✓ All other stakeholders, including but not limited to the parties mentioned above
- Reports may be submitted directly by the affected parties or through their representatives.
- Information related to the whistleblower will not be disclosed externally, except when required by law. If requested, the whistleblower's identity will not be disclosed to the reported party.
- Retaliatory acts against whistleblowers for submitting a report are strictly prohibited under the Code of Sustainable Procurement.



Whistleblowing Section Opening Period and How to Report

- Reporting Period: Until December 31, 2025
- How to Report: Submit the designated Whistleblowing Form ※¹ via email or post
 - ✓ E-mail address : grievance@suscode.expo2025.or.jp
 - ✓ Mailing address ※² : Japan Association for the 2025 World Exposition, Planning Bureau, Sustainability Department, Osaka Prefectural Government Sakishima Building, 1-14-16 Nanko Kita, Suminoe-ku, Osaka-shi, Osaka, Japan 559-0034

※¹ The Whistleblowing Form is available on the official Expo website:
(<https://www.expo2025.or.jp/en/overview/sustainability/>)

※² The mailing address may be subject to change. Please check the website for the latest information before sending your report.



Information Required for Reporting

- Please complete the designated Whistleblowing Form by providing the following information:
 - 1) Your name, address, and contact information (phone number and/or email address)
 - 2) Information about the individual/entity being reported
 - 3) Information to identify the goods or services procured by the Organiser of the World Expo 2025 or Pavilion Organisers
 - 4) Specific details of the negative impact
 - 5) Specific facts of the non-compliance and the relevant clause(s) of the Code of Sustainable Procurement
 - 6) Causal relationship between the non-compliance and the negative impact
 - 7) Resolution expected by the whistleblower
 - 8) Details of dialogue with the individual /entity being reported
 - 9) Whether the case is pending in another dispute resolution process or is being processed at this whistleblowing Section
- For more detailed guidance on how to complete each item, please refer to the separate document: "Instructions for Completing the Whistleblowing Form"
- You can download the Whistleblowing Form from the official website:
<https://www.expo2025.or.jp/en/overview/sustainability/>



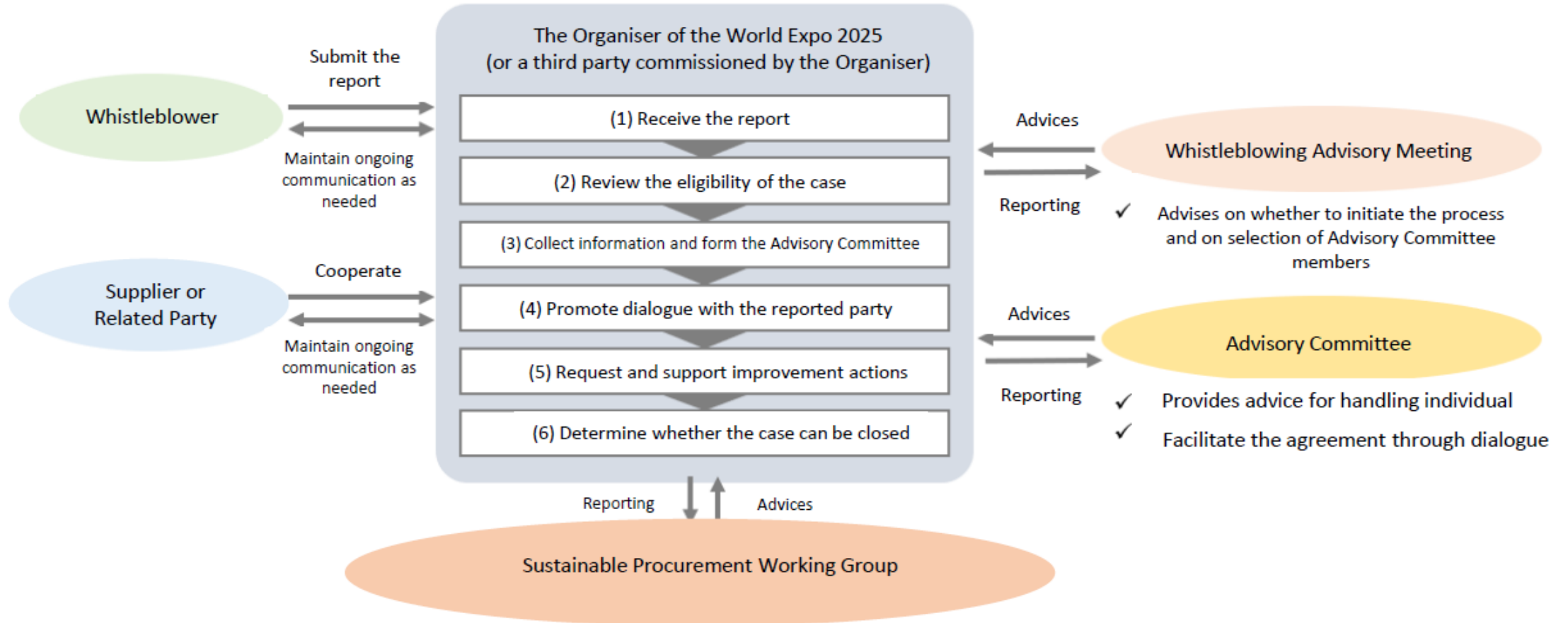
Information Required for Reporting

- The Whistleblowing Form should, in principle, be completed in **Japanese, English, or French**. Other languages may be accepted to the extent possible. However, please note that it may not be possible to process the report in some cases.
- To help determine whether the report falls within the scope of applicable cases qualifies and to ensure the process proceeds smoothly, please provide objective supporting information in as much detail as possible in the form.
- Even if the report is initially incomplete, it will not be rejected solely for that reason. Additional or revised information may be requested. If sufficient information is provided, the process may proceed.
- Please also review pages 5 to 7 of this document, including the section “Scope of Reports Handled.” This will help confirm whether the issue you wish to report falls within the scope of this system.



Report Processing Procedure

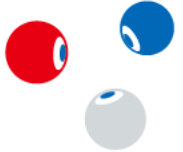
- The standard process for handling reports is illustrated below:



※Sustainable Procurement Working Group, Whistleblowing Advisory Committee, and Advisory Group:
These bodies are composed of experts to ensure neutrality and fairness, and to provide advice to the Organiser of the World Expo 2025.

Report Processing Procedure

- Depending on the nature and complexity of the case, multiple procedures may be carried out in parallel, or some steps may be omitted.
- If the whistleblower is **not a directly affected party** (e.g., not someone impacted by non-compliance with the Code of Sustainable Procurement), the Organiser of the World Expo 2025 may contact the whistleblower to determine whether dialogue with the affected party is possible. The whistleblower may be asked to facilitate contact with the affected party or their representative.
- If the whistleblower is a **representative**, the Organiser of the World Expo 2025 may contact the affected party directly to confirm the fact of representation.
- In cases where the affected party cannot be identified from a third-party report and dialogue is unlikely, the Organiser of the World Expo 2025 will still conduct fact-finding as part of “Step (3) Collect information” on the previous page. Based on the findings, improvement actions (Step (5)) may be taken if necessary, and the case is closed. Even in such cases, an **Advisory Committee** will be established. Upon request from the Organiser, the Committee will provide expert advice and recommendations.
- Reports that are malicious, defamatory, extremely trivial, or submitted with the intention of gaining a competitive advantage are deemed inappropriate. If a report is clearly found to fall outside the scope of the Whistleblowing Section, the process may not be initiated.



Additional Information

- Unless the whistleblower explicitly requests confidentiality, summaries of reports, the status of the whistleblowing procedure, the status of any improvement measures taken, and a summary of the outcome will be disclosed on **the official website**, following consultation with the Whistleblowing Advisory Committee and the Advisory Group.

Personal privacy will be appropriately protected when disclosing the above information.

<https://www.expo2025.or.jp/en/overview/sustainability/>

- The Organiser of the World Expo 2025 will provide regular updates on the number of reports received, the status of processing, and the status of publication, and submit them to the Sustainable Procurement Working Group.
- As the Organiser is a temporary organisation set to be dissolved after the Expo, the Whistleblowing Section will also close at the end of 2025. Depending on the timing and content of your submission, it may not be possible to complete the entire procedure before closure. Even in such cases, the Organiser will, to the extent possible, provide whistleblowers with information on **alternative grievance mechanisms** where applicable.

