

Annex7 : Formal Written Submission: Q&A for NCP Hearing

Purpose:

This annex demonstrates the whistleblower's good-faith commitment to mediation, while clarifying the structural and systemic nature of the case.

Preface (Reason for Written-Only Hearing)

I was subjected to prolonged, organized workplace harassment by the company, which forced me to take more than 52 days of medical leave.

As a result of this experience, even verbal communication in Japanese imposes severe psychological strain, making face-to-face or audio hearings functionally impossible.

This request for written-only communication is not based on personal convenience. It is a necessary health-based limitation, aligned with international principles prioritizing whistleblower safety (OECD Guidelines, UNCAC, G20 Principles, etc.).

■ 1. What is the purpose of your report?

The primary goal is **structural reform and international documentation**.

The domestic system failed to function. A Specific Instance was officially submitted to the Japanese NCP on **September 15, 2025**, but was entirely ignored without reply by **October 15, 2025**.

This confirms **institutional non-compliance** and forced me to seek international recourse.

Financial redress is **secondary**. I seek **symbolic and proportionate redress** as part of systemic remedy, aligned with **OECD Guidelines Ch. II §11** and **2023 Council Recommendation §20**.

■ 2. What was the content and public interest of the report?

Between **March and April 2025**, I submitted **eight whistleblower reports (Report No.0–7)** to the parent company, Infroneer Holdings.

Main Topics:

- **Report No.0 (3/16):** Accounting fraud and concealment of industrial accidents by the subsidiary (Maeda Corporation), already reported to authorities.
- **Reports No.1–6 (4/13):** Parent company's negligence, hotline dysfunction, audit failures, retaliation plans, etc.
- **Report No.7 (4/13):** Proposal for a systemic redesign cost (**JPY 5–9 billion**) as an institutional remedy, *not* a personal demand.

All reports included **documentary evidence** and contained **no falsehoods or personal threats**.

The company **rejected all reports without any investigation.**

■ 3. Did you demand JPY 20 billion in settlement?

No.

The “**JPY 20 billion**” label was a **false accusation by the company**, not based on any actual report.

It was deliberately misused to discredit the whistleblower.

No such demand appears in the evidence.

■ 4. How can you prove the authenticity of your evidence?

All documents are **primary sources**: emails, company notices, government replies.

Most have already been submitted to ministries (**Consumer Affairs Agency, MHLW, FSA, METI, MLIT**), making tampering impossible.

■ 5. Why is this a violation of the OECD Guidelines?

Clear violations include:

- **Ch. II §2, §11** – Retaliation prevention
- **Ch. II A10–14** – Due diligence failure
- **Ch. V §1** – Occupational safety violations
- **Ch. III** – Disclosure failures
- **Ch. VIII §1** – Failure of good-faith dialogue

Each of these was **structurally ignored**, and the whistleblower was **eliminated**.

■ 6. How did Japanese authorities respond?

Superficially accepted, but **no actual investigation or corrective action** was taken.

Each ministry (**CAA, MHLW, FSA, METI, MLIT**) deflected responsibility.

Ultimately, **52 concealed accidents, accounting fraud, and retaliatory dismissal** were ignored.

Even the **Japanese NCP (under MOFA)** failed to respond to the Specific Instance submitted on **Sept. 15, 2025**, by the **Oct. 15 deadline** — confirming **institutional failure**.

■ 7. What about the media and finance sector (NHK, MUFG)?

I reported to **NHK (media)** and **MUFG's audit hotline**.

Both acknowledged receipt, then went **silent**.

This revealed a **triple failure of oversight**: administrative, media, and financial.

■ 8. Were you reported to the police as a “threat”?

No.

There was **no police interrogation or investigation** against me.

In fact, I **submitted the evidence to the police**, and they confirmed **no wrongdoing on my part**.

If the company had truly filed a criminal report, I would have been contacted.

■ 9. Is the target of the report the parent company or subsidiary?

The target is the **parent company Infroneer Holdings**.

The subsidiary's misconduct is part of the case, but the **core issue** is the parent company's **refusal to investigate or rectify** — a **structural breach**.

■ 10. Why did you choose the NCP mechanism?

All domestic remedies **failed**.

Despite reports to **five agencies** and the **Japanese NCP**, no effective redress occurred.

The NCP, the **final domestic safeguard**, also failed by ignoring my report.

Thus, I turned to the **U.S. NCP**, which has jurisdiction due to the U.S. subsidiary (**Maeda America Inc.**) and offers the **only remaining international path to remedy**.

■ **11. Did you attempt dialogue with the company?**

Yes.

I submitted **formal whistleblower reports** to internal hotlines and legal departments.

All were **ignored or rejected**.

■ **12. Are you willing to accept mediation?**

Yes — **in written form only**, not in-person or oral meetings, for **health reasons**.

■ **13. What is the scale and basis of your compensation request?**

I propose a **system redesign cost** and **symbolic personal redress**, based on **OECD precedent levels**.

This is **not** a personal financial demand, but an **institutional remedy framework**.

■ **14. Have you received legal or NGO support?**

No.

I conducted all steps myself, including building the evidence website:

🌐 <https://www.whistleblower-protection.org>

■ 15. Did you create the evidence site yourself?

Yes.

All documents are **primary sources** and structured by the whistleblower personally.

■ 16. What makes this case unique among NCP submissions?

This is not just **corporate misconduct** — it is a **systemic collapse**.

All four institutional safeguards failed:

1. **Government:** Five ministries evaded responsibility.
2. **Media:** NHK ignored a real-name report with evidence.
3. **Finance:** MUFG's audit hotline rejected oversight.
4. **Japanese NCP:** Submitted Specific Instance was ignored.

👉 This is **unprecedented**: all oversight pillars failed **simultaneously**.

This case should be treated as a **symbolic OECD model case**.

■ 17. Do you still face risks due to your real-name reporting?

Yes — the risks are ongoing:

1. **Retaliation:**

The company refused to investigate and instead labeled my report as “defamation” and “extortion,” issuing a formal dismissal (Evidence No.10–12).

2. **Lack of protection:**

Japan’s whistleblower law offers no anonymity, burden-shifting, or emergency relief. Even the NCP ignored my submission, ending any effective remedy.

3. **Compounded risk:**

With no protection from the company, state, or NCP, I face stigma, blocked re-employment, and reputational harm.

4. **Why I used my real name:**

It was the only way to demand structural change — and that alone reveals how broken the system is.

5. **If mediation fails:**

- Share this case across OECD/NCP networks
- Register it as systemic non-compliance
- Ensure it sets a precedent for reform

👉 This case must not disappear.

The voice of the whistleblower must be recorded — not silenced.
