

## Advance Notice of Specific Instance Submission – Infroneer Holdings

木村俊介 <shukku9998@gmail.com>  
To: USNCP@state.gov

2025年10月9日 21:00

Dear U.S. National Contact Point,

I am writing to respectfully provide advance notice of my intention to submit a Specific Instance under the OECD Guidelines for Multinational Enterprises.

The case concerns Infroneer Holdings Corporation, a Japan-based multinational enterprise with a U.S. subsidiary (Maeda America Inc., established in 2022), and involves serious breaches of the OECD Guidelines across multiple chapters.

### Summary of Key Allegations:

- Concealment of **52 industrial accidents**
- **Three consecutive years** of accounting misstatements
- **Retaliatory dismissal** of the whistleblower who filed the reports
- **\*\*Systemic failure\*\*** of internal whistleblower channels
- Lack of **effective oversight** and due diligence at the group level

All supporting materials have already been prepared in English for your review, including:

- A dedicated **whistleblower evidence website** (with original documents)
- **Written responses** to anticipated questions from the NCP (**17 Q&A items**)
- A **comparative legal analysis** of Japanese domestic law and international standards (UNCAC, OECD Council Recommendations, and the Guidelines)

### Relevant references include:

- **OECD Guidelines:** Chapters I.4, II.2, II.11, III, IV.2, V.1, VIII.1
- **OECD Council Recommendation** on the Guidelines (2023): Part II, Paragraph 20
  - **“NCPs should cooperate and, where necessary, coordinate in handling specific instances, especially in cases involving more than one country.”**
- **UNCAC Article 33:** Protection of reporting persons

Given the inaction of the Japanese NCP despite a complete and properly submitted case file, and considering that this Specific Instance involves a multinational enterprise with operations in the United States, I respectfully submit that engagement by the U.S. NCP is appropriate and in line with OECD procedures and expectations.

I remain fully committed to cooperating with your office and would appreciate any guidance you may provide regarding submission formats, procedures, or additional requirements.

The full submission is scheduled for **mid-October 2025**. This message is provided as a courtesy out of respect for your office, and I will follow up accordingly with the complete materials.

Thank you very much for your time and consideration.

Sincerely,  
Shunsuke Kimura  
Whistleblower / Former employee of Maeda Corporation  
(a 100% subsidiary of Infroneer Holdings Corporation)

[Contact information will be included in the formal submission]