



# Canon Emirates Speak-Up Policy

<b>Scope</b>	Canon Emirates LLC
<b>Brief Description</b>	This policy establishes a system which internal and external stakeholders can use to raise concerns about unethical behavior if they are unable, or it is inappropriate for them, to use alternative avenues for reporting. It protects those who speak up in good faith, as well as innocent individuals against whom deliberately false or malicious accusations are made.
<b>Related Documents</b>	A004_Canon EMEA Speak-Up Policy

<b>Last Update Date</b>	N/A	<b>Latest Version</b>	1.0
<b>Enactment Date</b>	<b>01<sup>st</sup> Aug 2024</b>		

<b>Policy Owner (*Head of RSO BU/Function)</b>	Sr. Legal Counsel, <b>Canon Middle East and Türkiye</b>
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# Canon Emirates Speak-Up Policy

## 1. Purpose

The Canon Emirates Speak-Up Policy is in place to support the reporting of concerns of unethical behaviour, wrongdoing, malpractice and/or misconduct.

At Canon, we aim to apply a proactive attitude and approach when dealing with concerns of this nature. We encourage the reporting of such matters, with a commitment to protect all who raise a concern in good faith.

Whilst working with Canon, you may see or hear things that you think may be illegal or unethical or which may break Canon's Code of Conduct and which could potentially damage Canon, its employees and/or its business relationships.

Usually, these concerns can be resolved through one of our other procedures (which are set out, for example, in your local employee handbook). We encourage you to consider talking, in the first instance, to your trusted manager, internal Legal Counsel, HR Business Partner or, if external to Canon, your usual Canon contact. We would rather hear your concerns directly so that we can resolve them directly.

However, where your concern is about serious wrongdoing and there is no other relevant procedure, or you have genuine concerns about using an existing procedure, it can be difficult to know what to do.

This Policy explains how to raise such concerns at an early stage and in the right way, so that we can investigate them and, if necessary, take action. If you have a genuine concern, please report this with any information which supports your concern. Canon is committed to investigating and taking action to address any wrongdoing which is reported under this Policy.

This Policy also protects those who speak up in good faith, as well as innocent individuals against whom deliberately false or malicious accusations are made.

Our senior leaders are committed to an open and honest culture. We will look into what you report and you will always have access to the support you need.

## 2. Scope

This policy applies to Canon Emirates LLC and is applicable to all officers, employees, and contractors of any of the entities, companies or organizations of Canon Emirates LLC.

Any reference to "**Canon Emirates**" in this Policy shall be deemed to include any and all of the entities, branches and representative offices set forth above.

## 3. Who can raise a concern?

Anyone who works for, has a relationship with, or is a contact of Canon Emirates may report suspected wrongdoings. This includes permanent and temporary employees, interns, trainees,

volunteers, former employees, job applicants, self-employed persons working as, and individuals working for, contractors and subcontractors, Canon suppliers and their employees, channel partners, and customers.

#### **4. When is it appropriate to use this, Policy?**

This Policy can be used to raise genuine concerns about suspected misconduct within Canon Emirates, which means any violation of our Code of Conduct and/or our policies and/or the laws under which we operate.

Examples of concerns that can be raised using this Policy are:

- Fraud and fraudulent (financial) reporting
- Human rights violations (including child labour, forced labour including modern slavery, bullying violence, etc.)
- Discrimination, aggression, or harassment
- Violations of competition laws
- Money laundering
- Violations of sanctions and export control laws
- Inaccurate record-keeping (financial or non-financial)
- Bribery or corruption
- Conflicts of interest
- Environmental, health and safety violations
- Improper use of company resources
- Insider trading
- Unlawful disclosure of confidential information
- Privacy violations
- Criminal offences
- Retaliation against anyone for speaking up in good faith.

Do not use this Policy:

- To report personal grievances and complaints in relation to HR matters (for example, grievances related to your terms of employment or performance-related issues) or for reporting health or safety risks. In those cases, please follow the relevant process as described in your local employee handbook or procedure.
- To report immediate or urgent issues, where there is an immediate threat to life or property, or where you need emergency assistance. In those cases, please contact your local authority's or your country's emergency services.
- To settle personal disputes.
- To make accusations which you know, or reasonably should know, are false or based on unsubstantiated gossip or hearsay. Doing so may lead to disciplinary measures.

## 5. How can you raise a concern?

We would rather hear your concerns directly so that we can resolve them directly. You can report a suspected wrongdoing in many different ways, and we encourage you to consider talking, in the first instance, to your trusted manager, internal Legal Counsel, HR Business Partner or, if external to Canon, your usual Canon contact.

This Policy does not replace Canon's regular reporting lines or complaint procedures. However, if you do not feel comfortable raising concerns using these methods, you can report a suspected wrongdoing using one of the Speak-Up reporting channels below:

- The **Canon Emirates Speak-Up Committee**, (comprising selected members of the management team of Canon Middle East FZ- LLC (i.e., Managing Director, Financial Director, HR Director, Sr. Legal Counsel), will receive reports through the below intake channels:
  - **By email:** Please send an email to [speak-up@canon-emirates.ae](mailto:speak-up@canon-emirates.ae)
  - **By letter:** Please send letters to:  
Canon Middle East FZ-LLC  
c/o Managing Director  
Dubai Internet City, Canon Building  
P.O. Box: 500 007  
Dubai, United Arab Emirates

Please note that reports made to the Canon Emirates Speak-Up Committee will be shared with the EMEA Speak-Up Committee (see below) even if handled by the Canon Emirates Speak-Up Committee. In some cases, local reported Speak-Up reports may be handled by the EMEA Speak-Up Committee as deemed appropriate by the EMEA Speak-Up Committee.

- The **EMEA Speak-Up Committee**, (comprising selected members of the EMEA Regional Headquarters (i.e., Heads of HR, Finance and Legal in Canon Europe Ltd.)), will receive reports through Speak-Up reporting channels specified in the EMEA Speak-Up Policy. For more information on the EMEA Speak-Up process, please consult the EMEA Speak-Up Policy.

Please note that where deemed appropriate, reports made directly to the EMEA Speak-Up Committee may be shared with the Canon Emirates Speak-Up Committee. In some cases, the EMEA Speak-Up Committee may ask the Canon Emirates Speak-Up Committee to handle the reports if it is considered appropriate. An exception to this will be in cases where the EMEA Speak-Up Committee takes a report as an escalation to the EMEA Regional Headquarters and it would not be appropriate for the Canon Emirates Speak-Up Committee to deal with the report (e.g., suspected misconduct by senior management in Canon Emirates).

## 6. Can you report anonymously?

Yes, you can report anonymously. However, please be aware that anonymous reports may be difficult to investigate. It is helpful to have a way of contacting you, in case we need more information in order to investigate your report.

## 7. What information will you need to provide?

When you file a report (in person, in writing or online), please provide as much detailed information as you can to enable our company to assess and investigate your concern, such as:

- The reason for the concern and any relevant background/history.
- Names, dates, places and any other relevant information.
- Any documentation that may support your report.

A report can only be followed up if it contains sufficiently detailed information to enable an investigation to be carried out. Only when a sufficient level of information has been provided can an investigation be initiated.

All personal data you provide while reporting a concern will be processed in accordance with applicable privacy and data protection rules and regulations. For information on the processing of personal data, please refer to the **EMEA Speak-Up Privacy Notice**.

## 8. What happens after you report a concern?

Canon takes every report of possible misconduct seriously. The following process shows how a report will be handled when the report is received by, or assigned to, the Canon Emirates Speak-Up Committee only. For more information on how the EMEA Speak-Up Committees handle reports, please consult the EMEA Speak-Up Policy.

### Receipt of report

Upon submission of a report, you will receive confirmation that your report has been received **within seven days of receipt**. The Speak-Up Committee will make an initial assessment to check whether the report should be handled as a Speak-Up case under this Policy (please see Section 4: 'Do not use this Policy').

A Speak-Up Representative, nominated by the Canon Emirates Speak-Up Committee, will support the Canon Emirates Speak-Up Committee to handle the reports properly and may contact you for further information where necessary, in their role as the trusted person-in-charge.

### Investigation

The Canon Emirates Speak-Up Committee will decide whether a formal Speak-Up investigation is needed (e.g., based on whether a sufficient level of information has been provided to initiate an investigation), and if so, what type of investigation is appropriate. The Canon Emirates Speak-Up Committee will gather facts regarding the report. The Canon Emirates Speak-Up Committee may also appoint internal and/or external investigators to collect data by means of interviews/desk research and analyse their findings and report to the Speak-Up Committee. Appointed

investigators will have the necessary expertise and training and will be selected to avoid a conflict of interest based on the specific case.

Throughout the investigation, the Speak-Up Representative remains the central point of contact for all involved parties, including reporters, accused parties and other directly involved people, regarding any questions or issues related to the pending investigation.

### **Feedback**

Generally, feedback and follow up will be provided **within three months** following confirmation of receipt of the initial report. You will be informed of overall findings, i.e. whether or not Canon has established that misconduct has taken place.

Please note that the level of detail provided regarding the outcome of a case (or related actions taken) will be subject to rules on confidentiality, privacy and any relevant legal rights of the parties involved.

## **9. Confidentiality and Zero-tolerance on retaliation**

### ■ **Confidentiality**

If you report in good faith, then:

- Your identity will be kept confidential by Canon unless the law requires us to disclose it (for example in the context of investigations by authorities or judicial proceedings, in particular to safeguard the rights of defence of someone who has raised a genuine concern) or if you have given us your permission to reveal your identity.
- Your information will be protected and will be treated with complete confidentiality unless you choose for it not to be confidential. Please note that we may be required to share some information of the concern raised, in a controlled manner, with necessary individuals as part of the investigation procedure.

### ■ **Zero tolerance on Retaliation**

Canon will not tolerate any form of retaliation or any other form of adverse consequences against employees or third parties who raise a concern or participate in an investigation about suspected wrongdoing. Retaliation (whether through threat, intimidation, exclusion, humiliation or similar) against reporters is a violation of our Code of Conduct and may lead to disciplinary measures.

The above protections for confidentiality and no retaliation also apply for people connected to you who in good faith help or support you in reporting your complaint, e.g. colleagues and relatives of yours.

You cannot rely on this protection, however, if you maliciously raise a concern that you know, or should reasonably know, is false, or report unsubstantiated hearsay or gossip with intention to cause harm to those affected. Further, doing so may be subject to disciplinary and/or criminal offence.

### Important Notice

- All individuals working for the Canon EMEA Group are obliged to abide by Canon's Code of Conduct.
- If you are personally involved in the reported wrongdoing, disciplinary or criminal proceedings may be taken against you. However, the fact that you have disclosed the wrongdoing will be taken into account in any proceedings.

- It is prohibited to obstruct any investigation, to try to seek out the identity of a reporter or to take any retaliatory action against a reporter.

## 10. What if you have a question or need additional information?

If you have any doubts about whether you should report an issue or require additional information about the Speak-Up process, you can raise questions or request for a confidential meeting with the Speak-Up Champion for Canon Emirates appointed by the Canon Emirates Speak-Up Committee. (If you are not sure who your local Speak-Up Champion is, please contact your local HR Business Partner). Your Speak-Up Champion will be able to advise on the process if necessary.

## 11. Can you also file a report outside Canon?

This Policy is intended to encourage and enable employees and others to raise serious concerns within Canon rather than seeking a solution outside Canon. However, it is not the intention of this Policy to restrict any legal right or obligation you may have under the laws of your country to file reports of any wrongdoing to the relevant authorities in your country.

## 12. Policy Owner

The owner of this Policy is the Sr. Legal Counsel, Canon Middle East and Türkiye

## 13. Document Control

Version No.	Effective Date	Approved by (Name & Title)	Approval Date	Description	Author (Name & Title)
1.0	01/08/2024	Venkatasubramanian Hariharan (Managing Director, Canon Middle East and Türkiye)	30/07/2024		Gülin Bozoğlu (Sr Legal Counsel, Canon Middle East and Türkiye)