

Speak-Up policy

Canon Finland

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| Coverage | Canon Oy Majority-owned subsidiaries of Canon Oy |
| Short description | This policy is based on and in accordance with the Canon EMEA Speak-Up Policy. Both internal and external individuals may raise concerns about unethical behaviour under either the Canon EMEA Speak-Up Policy or the Canon Oy Speak-Up Policy. This policy creates a system for internal and external stakeholders to raise concerns about unethical behaviour if they are unable to report them through other channels or if reporting through other channels is not appropriate for them. The practice protects both those who speak in good faith and those against whom false or malicious accusations have been made. |
| Related documents | Canon Group Code of Conduct Canon EMEA Policy |

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| Last Updated | 26/06/2025 | Latest version | 2.0 |
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| Policy Owner (*RSHQ BU Coordinator or Business Director) | Managing director |
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Canon Ltd's policy for intervening in inappropriate activities

1. Purpose

Canon Oy Speak-Up Policy has been developed to support the reporting of allegations of unethical behavior, breaches, misconduct and/or misconduct.

At Canon, we strive to take a proactive approach when addressing these types of concerns. We encourage such reports and are committed to protecting anyone who reports their concerns in good faith.

When working at or with Canon, you may see or hear things that you believe may be illegal or unethical, or that may violate Canon's policies and that may harm Canon, its employees and/or its business relationships. These problems can usually be resolved through other procedures (such as those specified in the local worker's handbook). We recommend that you first discuss the matter with your supervisor, the company's lawyer or HR partner. If you are not an employee of Canon, please contact a Canon representative. We would prefer to hear your concerns directly so that we can also resolve them without intermediaries. However, if your concern is related to serious misconduct and other relevant procedures are not available, or you are genuinely concerned about the use of existing procedures, it may be difficult for you to know what to do.

This policy explains how to report such concerns early and in the right way so that we can investigate them and take action if necessary. If you have a genuine concern, please report it and include any information that supports your concern. Canon is committed to investigating concerns reported in accordance with this policy and taking steps to address potential violations and abuses.

This practice protects both those who speak in good faith and those against whom false or malicious accusations have been made.

Our management is committed to an open and honest corporate culture. Based on your report, we will initiate investigations and provide you with the support you need.

2. Area of influence

This policy applies to Canon Ltd and to companies that are directly or indirectly owned by Canon Ltd. It is applicable to all managers, employees, consultants and subcontractors.

3. Who can report concerns?

Anyone who works for, is in contact with, or is a contact of Canon Oy can report suspected violations. This applies to all employees, trainees, volunteers, former employees, job applicants, self-employed persons and individuals acting as contractors or suppliers, as well as their employees, business partners and customers.

4. When is it appropriate to use this policy?

This policy may be used to raise sincere suspicions regarding misconduct within Canon. This includes any breach of the Company's Code of Conduct and/or policies and/or laws under which Canon operates.

Examples of concerns you can report using this policy include:

- Fraud and fraudulent (financial) reporting
- human rights violations (including child labor, modern slavery, workplace bullying and violence);
- discrimination, harassment or aggression
- Violation of competition laws
- money laundering
- violation of sanctions and export control legislation
- inaccurate accounting (financial or otherwise)
- bribery or corruption
- Conflicts of interest
- Environmental, health and safety violations
- Inappropriate use of company resources
- insider trading
- unlawful disclosure of confidential information
- Privacy Violations
- Crimes
- retaliation against persons who have reported in good faith.

This policy is not intended for the following purposes:

- This policy is not intended for personal complaints related to human resources management matters (e.g. grievances related to working conditions or misperformance at work) or health and safety risks. In these cases, follow the applicable instructions in the local worker's manual and other local practices.
- This policy is not intended to report urgent matters when there is an imminent threat to life or property, or if you need assistance in an emergency. In such cases, contact your local authority or emergency services.
- This policy is not intended to resolve personal disputes.
- This policy is not intended to make allegations that you know or reasonably should have known to be false or based on false gossip or hearsay. Such actions may lead to disciplinary action.

5. How can you report a concern?

We would prefer to hear your concerns directly so that we can also resolve them without intermediaries. You can report suspected misconduct in a variety of ways. We recommend that you first discuss the matter with your manager, the company's lawyer or HR partner. If you are not an employee of Canon, please contact a Canon representative.

This policy does not replace Canon's standard reporting channels or complaint procedures. However, if you do not wish to report your concerns through these channels, you can report the suspected misconduct through one of the channels listed below:

- Canon Oy's Speak-Up Committee, which is comprised of selected members of Canon Oy's management team (Managing Director, Chief Financial Officer, Chief Information Security Officer and Chief Human Resources Officer), will receive notifications through the following channels:
 - **Network:** [Canon's EMEA Misconduct Response System \(EthicsPoint\)](#) is a secure online channel operated by an independent company on behalf of the EMEA Misconduct Committee. Canon's EMEA Inappropriate Response System is available around the clock, every day of the week. It can be used to send notifications in different languages.

If you do not wish to use Canon's EMEA Inappropriate Conduct System, you may report it to the EMEA Inappropriate Response Committee by email, post or in person.

- **Email:** send an email to speak-up@canon.fi

- **Mail:** send your notification by post to
Canon Ltd
c/o Speak-Up committee
Huopalahdentie 24
00351 Helsinki
Finland
- **Personally:** You can contact a member of the Canon Ltd Speak-Up Committee directly:
Managing director
VP Finance
Information Security
VP Human Resources

Please note that matters reported to Canon Oy's Speak-Up Committee will also be shared with Canon EMEA's Speak-Up Committee, even if they are handled locally by Canon Oy. In some cases, based on the appropriateness of the situation, locally reported Speak-Up cases may be referred to the EMEA Speak-Up Committee.

- The EMEA Speak-Up Committee, comprised of selected members of the EMEA headquarters management team (Chief Human Resources Officer, Chief Financial Officer and General Counsel of Canon Europe Ltd), receives notifications through the Speak-Up reporting channels set out in the EMEA Speak-Up Policy. For more information, see the EMEA Speak-Up Policy.

Please note that if deemed appropriate, reports submitted directly to the Canon EMEA Speak-Up Committee may be shared with the Canon Oy Speak-Up Committee. In some cases, the EMEA Speak-Up Committee may request the Canon Ltd Speak-Up Committee to review the report if deemed appropriate.

6. Can reports be made anonymously?

Yes, reports can be made anonymously. However, be aware that it can be difficult to investigate anonymous reports. Providing contact information may be useful in case we need additional information to investigate your report. Canon's EMEA Misconduct Response System allows us to communicate with you online in a way that protects your identity.

7. What information do you need to provide?

When you make a report (in person, in writing or online), please provide as much information as possible so that our company can assess the situation and investigate your concerns. For example, enter the following information:

- Cause of concern and applicable background and history
- names, dates, places and other applicable information
- any documentation that may support your listing.

The report can only be processed if it contains sufficiently detailed information to allow the matter to be investigated. The investigation can only be started when sufficient information has been obtained on the matter.

Any personal data you provide in connection with the report will be processed in accordance with applicable data protection rules. For more information on the processing of personal data, please read the [Privacy Notice](#).

8. What happens when you make a report?

Canon takes any reports of potential abuse seriously. Below is the process by which a report is processed when a report is made or escalated to the EMEA Inappropriate Response Committee. To learn more about how local inappropriate response committees handle reports, please refer to the local policy of the company in question, which defines the process it uses. If the local Inappropriate Response Committee has not determined how reports will be handled, they will be handled in accordance with the process described below.

Receipt of the notification

When you submit a notification, you will receive a confirmation of receipt within seven days of receipt. The Committee on Addressing Inappropriate Conduct conducts an initial assessment to determine whether the report should be treated as a case of inappropriate intervention in accordance with this Policy (see Section 4 for more information). Members of the Committee for Addressing Inappropriate Conduct may contact you to request additional information in their role as a trustee.

Research

The Inappropriate Conduct Committee decides whether the report requires a formal investigation into the inappropriate conduct (based on whether the report contains enough information to initiate an investigation). It also decides what kind of investigation should be carried out in response to the report. The Committee for Intervening in Inappropriate Behaviour collects information related to the report. The Inappropriate Conduct Committee may also appoint internal and/or external investigators to gather

information through interviews or investigations, and to analyse their findings and report them to the Inappropriate Conduct Committee. The appointed researchers have the necessary expertise and training and are selected on a case-by-case basis in such a way as to avoid conflicts of interest.

During the investigation, the Inappropriate Intervention Representatives act as key contacts for all parties involved (including whistleblowers, accused parties and other directly involved parties) for all questions and issues related to the ongoing investigation.

Feedback

Feedback and information on follow-up actions are usually provided within three months of the receipt of the notification. You will be informed of the outcome of the investigation – i.e. whether Canon believes that there was indeed abuse.

Please note, the exact information to be provided about the outcome of the case (or the actions taken in relation to it) will depend on confidentiality and data protection rules, as well as any legal rights of the parties involved.

9. Confidentiality and zero tolerance for retaliation

■ Confidentiality

If you report a violation in good faith:

- Canon will keep your identity confidential unless disclosure is required by law (e.g. in connection with government investigations or legal proceedings, in particular to protect the rights of the person who has reported a genuine concern) or if you have given us permission to disclose your identity.
- Your information will be protected and treated with complete confidentiality, unless you choose not to be confidential. Please note that we may need to share some information with the necessary individuals to report the concern in a controlled manner as part of the investigation process.

■ Zero tolerance for retaliation

Canon will not tolerate retaliation or other adverse consequences against employees or third parties who report concerns or participate in an investigation of suspected misconduct. Retaliation (such as threatening, intimidating, disqualifying, or humiliating) against whistleblowers is a violation of our Code of Conduct and may result in disciplinary action.

The above safeguards of confidentiality and zero tolerance for retaliation also apply to

individuals who communicate with you in good faith or who support you in reporting concerns and violations (e.g. colleagues and relatives).

However, you cannot invoke this protection if you report in bad faith a concern that you know or should reasonably know is false, or if you report unfounded hearsay or gossip with the intent to cause harm to those affected. This may result in disciplinary action and/or be a criminal offense.

Important Notice

- All Canon EMEA group employees are required to comply with Canon's Code of Conduct.
- If you are personally involved in reported violations, you may be subject to disciplinary action or criminal prosecution. However, the fact that you have disclosed misconduct will be considered in all legal action.
- Investigations based on the report may not be obstructed, attempts may not be made to establish the identity of the person making the report, and retaliation may not be taken against the person who made the report.

10. If you have any questions or need more information

If you are unsure whether you should report a concern, or need more information about the inappropriate response process, you can ask questions or request a confidential meeting with a contact person appointed by your organisation's Inappropriate Response Committee. (If you don't know who your local inappropriate contact is, check your local inappropriate policy or contact your local HR partner). The local contact person for intervening in inappropriate behaviour can advise you on the process if necessary.

If you do not think it is appropriate to have a conversation with the EthicsPoint contact person or if you have any concerns about this, you can submit a question by using the [EMEA EthicsPoint](#) system.

11. Can I report to anyone other than Canon?

The purpose of this policy is to encourage (and enable) employees and others to report serious concerns internally within Canon rather than seeking to resolve them outside of Canon. However, this policy is not intended to limit any legal right or obligation you may have under the laws of your country to report potential misconduct to the relevant authorities in your country.

12. Policy Owner

This policy is owned by Canon Ltd. and is owned by the Managing Director.

13. Document Management

| Versionumero | Entry into force | Approver (name and job title) | Date of Adoption | Description | Author (name and job title) |
|--------------|------------------|----------------------------------|---------------------|--|--|
| 1.0 | 01/01/2025 | Tommi Laitinen (Canon Oy MD) | 18/12/2024 | Original policy | Katja Hautala (HR Director) |
| 2.0 | 01/07/2025 | Tommi Laitinen (Canon Oy MD) | 26/06/2025 | Content modified to take into account Canon Oy's local Speak-Up Committee | Kari Keskinen (CFI Privacy Champion) |