



Canon EMEA Speak-Up Policy

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1. Purpose

The Canon EMEA 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. Who are we?

In this Policy "Canon", referred to as "we", "us", "our" or "Canon", shall mean Canon Europa N.V. (CENV) and companies owned by CENV, directly or indirectly, with more than 50% ownership.

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3. Who can raise a concern?

Anyone who works for, has a relationship with, or is a contact of Canon in the EMEA region 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, 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.

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- 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 **EMEA Speak-Up Committee**, (comprising selected members of the senior management team of the EMEA Regional Headquarters (i.e., Heads of HR, Finance and Legal in Canon Europe Ltd.)), will receive reports through the below intake channels:
 - **Via online:** The [Canon EMEA Speak-Up system \(EthicsPoint\)](#), is a secure online intake channel, which is administrated by an independent company on behalf of the EMEA Speak-Up Committee. The Canon EMEA Speak-Up system is available 24 hours a day, seven days a week, and can accommodate reports in different languages.

If you prefer not to use the Canon EMEA Speak-Up system, you can make a report by email, by letter or in person to the EMEA Speak-Up Committee.

- **By email:** Please send an email to speak-up@canon-europe.com
- **By letter:** Please send letters to:
Canon Europe Limited
c/o Senior Vice President Legal, IP, Privacy & Governance and Corporate Development
4 Roundwood Avenue
Stockley Park

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Uxbridge UB11 1AF
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Please note that where deemed appropriate, reports made directly to the EMEA Speak-Up Committee may be shared with the relevant local Speak-Up Committee. In some cases, the EMEA Speak-Up Committee may ask the local 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 Local Speak-Up Committee to deal with the report (e.g., suspected misconduct by senior management in the local organization).

- The **local Speak-Up Committees** of Canon EMEA group companies, (each comprising selected members of their management teams specified in the local Speak-Up policies), will have their own local channels as specified in their individual local policies:

You can make a report to a local Speak-Up Committee by email, by letter, in person or using other channels set up by the relevant local Speak-Up Committee. To make a report to a local Speak-Up Committee, please consult the local Speak-Up policy of the relevant group company for more information on their contact details and local procedure.

Please note that reports made to a local Speak-Up Committee will be shared with the EMEA Speak-Up Committee even if handled by the local 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.

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. The Canon EMEA Speak-Up system allows us to communicate with you online, while also protecting your identity.

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,

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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 escalated to, the EMEA Speak-Up Committee only. For more information on how the local Speak-Up Committees handle reports, please consult that company's local policy for their relevant process. Where the local Speak-Up Committees don't specify how reports are handled, the following process applies.

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').

Speak-Up Representatives, nominated by the Speak-Up Committees, will support the relevant 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 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 Speak-Up Committee will gather facts regarding the report. The 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.

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Throughout the investigation, the Speak-Up Representatives remain 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 these protections, however, if you maliciously raise a concern that you know, or should reasonably know, is false, or report unsubstantiated hearsay or gossip with

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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 appointed by the Speak-Up Committee of your organisation. (If you are not sure who your local Speak-Up Champion is, please refer to the relevant local Speak-Up policy or contact your local HR Business Partner). Your local Speak-Up Champion will be able to advise on the process if necessary.

If you feel a discussion with your Speak-Up Champion may not be appropriate, or if you have any issues doing so, then please send your questions via the [EMEA Speak-Up system \(EthicsPoint\)](#)'s "Ask a question online" button.

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.

(end)