



[Tier 1]

Canon EMEA Speak-Up Policy

Scope	(i) HQs (CENV& CEL) + (ii) NSOs + (iii) RSOs + (iv) NSO/RSOs' Majority-owned Subsidiaries + (v) Other CENV's Majority-owned Subsidiaries
Brief Description	The policy establishes a system employees can use to raise concerns about unethical behaviour if they have exhausted the normal processes. It protects those who speak up in good faith, as well as innocent individuals against whom deliberately false or malicious accusations are made.
Related Documents	Speak-Up Procedure

Last Update Date	01/01/2022	Latest Version	1.0
Enactment Date	01/11/2018		

Policy Owner (*Head of RSHQ BU/Function)	SVP Legal, IP, Privacy & Sustainability
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Canon EMEA Speak-Up Policy

1. Purpose

Canon has a proactive attitude and approach towards raising concerns and we protect anyone who speaks up in good faith. While 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. It is better to raise something about which you have a genuine concern, rather than wait for absolute proof. 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.

You may feel worried about raising a concern and we understand this, but please don't be put off. Our senior leaders are committed to an open and honest culture. We will look into what you say and you will always have access to the support you need.

2. Scope

This policy applies to companies owned by Canon Europa N.V., directly or indirectly, with more than 50% ownership and is applicable to all officers, employees and contractors of those companies.

3. Who does this apply to?

Anyone who works for or 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, self-employed persons working as, and individuals working for, contractors and subcontractors, and Canon suppliers and their employees.

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 serious 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
- Human rights violations (including child labour, forced labour including modern slavery, bullying, violence, etc.)
- Discrimination or harassment (if you have exhausted your local process or if it is relating to top management in your location)
- Violations of competition laws
- Money laundering or violations of sanction laws
- Inaccurate financial record-keeping
- Bribery
- Serious conflicts of interest
- Environmental, health and safety violations
- Improper use of company resources
- Insider trading
- Unlawful disclosure of confidential information
- Retaliation against anyone for speaking up in good faith.

Do not use this policy:

- To report employment-related complaints (for example, grievances related to your terms of employment) or for reporting health or safety risks. In those cases, please follow the specific procedures 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 are false. Doing so may lead to disciplinary measures.

5. Zero tolerance on retaliation

Canon is committed on a global level to assist employees who wish to raise genuine concerns. This Policy applies to the EMEA region and there are equivalent policies in all other Canon Group companies.

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 defense 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.
- You will not be penalized for raising concerns about suspected misconduct. 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 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 will not be protected, however, if you maliciously raise a concern that you know is false.

Important Notice

- All individuals working for the Canon Europe Group are contractually obliged to abide by the Canon Group 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 identify the identity of a reporter or to take any retaliatory action against a reporter.

6. Policy Owner

The owner of this policy is the SVP Legal, IP, Privacy & Sustainability.

7. Document Control

Version No.	Effective Date	Approved by (Name & Title)	Approval Date	Description	Author (Name & Title)
1.0	01/01/2022	Yuichi Ishizuka (EMEA CEO)	14/12/2021	Initial Policy	Jens Dohmgoergen, (Legal Director)