

Terms of Use for the Responsible Business Conduct Hotline

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Article 1. Role of Responsible Business Conduct Hotline (hereinafter "Hotline")

1. This Hotline receives whistleblowing reports without limiting the type of a whistleblower or the field of a whistleblowing report, except in certain cases, and conducts necessary investigations and takes corrective actions in accordance with the provisions of these Terms of Use.
2. For details on the scope of persons who may use this Hotline and subject matters, please refer to Article 2 and subsequent Articles.

Article 2. Person who may use this Hotline

This Hotline may be used by anyone listed below:

- (1) Directors, officers and employees (including dispatched workers, etc.; the same shall apply hereinafter in this Article) of Canon Inc. (hereinafter "CINC") and Canon Group companies (hereinafter collectively "Canon Group");
- (2) Former directors, officers and employees of the Canon Group;
- (3) Suppliers that provide goods or services directly to the Canon Group;
- (4) Customers who receive goods or services directly from the Canon Group;
- (5) Candidates for employment in the Canon Group;
- (6) Canon Group shareholders;
- (7) Any other persons having certain relationships with the Canon Group (including those who are negotiating a contract with the Canon Group);
- (8) Proxies of the above-mentioned persons;
- (9) Natural or legal persons who are affected or have reasonable grounds to believe that they might be affected by an Adverse Impact (as defined in Article 4), and the legitimate representatives of such persons on behalf of them, such as civil society organisations and human rights defenders;
- (10) Trade unions and other workers' representatives representing natural persons working in CINC's and its subsidiaries' chain of activities concerned; and
- (11) Civil society organisations that are active and experienced in related areas where an adverse environmental impact is the subject matter of the complaint.

Article 3. Reporting method

A whistleblowing report shall be submitted using a dedicated form. Depending on the circumstances of this Hotline, the reporting method may be changed.

Article 4. Scope of whistleblowing

1. This Hotline may be used to report specific complaints related to actual or potential adverse human rights impacts or environmental impacts, as set forth in the DIRECTIVE (EU) 2024/1760 (including subsequent amendments thereto), with respect to CINC's own operations, the operations of its subsidiaries or the

operations of their business partners in their chains of activities (e.g., child labor at a third-tier supplier, hereinafter collectively the “Adverse Impacts”), and to request an investigation and corrective action.

2. In addition to the preceding paragraph, this Hotline may also be used to report facts or acts alleged to have been committed by CINC, any of the Canon Group, or any of their directors, officers or employees (including dispatched workers, etc.), as set forth in the following sub-paragraphs, and to request an investigation and corrective action:

- (1) Reportable facts as defined in the whistleblowing-related law(s) or regulation(s) of the country or region where the whistleblower is located (such as the Whistleblower Protection Act in Japan);
- (2) Acts suspected of being illegal under relevant law(s) or regulation(s);
- (3) Acts suspected of violating the Canon Group Code of Conduct;
- (4) Acts suspected of violating the work regulation(s), company rule(s), or other internal rule(s) of any Canon Group company; or
- (5) Acts suspected of violating the corporate ethics of the Canon Group.

3. Specific examples of acts that a whistleblower may report under the preceding paragraph are as follows:

- (1) Improper transactions (bid rigging, cartels, unfair acts against subcontractors, insider trading, etc.);
- (2) Improper representation (false representation and misrepresentation in catalogs and websites);
- (3) Improper accounting (improper handling of fixed assets, development expenses and entertainment expenses, etc.);
- (4) Improper asset management (embezzlement, unauthorized private use of equipment, etc.);
- (5) Improper labor management (such as forcing employees qualified to overtime payment to work overtime without pay);
- (6) Improper information management (unauthorized removal of confidential materials, confidential information leak, etc.);
- (7) Quality fraud (falsification of test data, improper acquisition of certification, use of non-compliant parts, etc.);
- (8) Collusion with civil servants and business partners (such as giving bribes and gifts that go beyond socially acceptable norms); and
- (9) Harassment (abuse of authority, work-place bullying, sexual harassment, pregnancy discrimination, etc.).

4. A whistleblowing report shall be made in good faith and shall not be false, libelous, or otherwise improper.

5. In principle, this Hotline shall not investigate or respond to the following matters, even if this Hotline receives a whistleblowing report:

- (1) Dissatisfaction with personnel shuffles, job performance assessments, etc.;
- (2) Dissatisfaction with supervisor, superiors, colleagues and subordinates, etc.;
- (3) Dissatisfaction with employment conditions;
- (4) Private matters; and
- (5) Other matters unrelated to the facts or acts specified in Paragraph 1 and 2 mentioned above.

Article 5. Information and evidence required when using this Hotline

1. When reporting, please provide your organizational affiliation (or relationship with the Canon Group), name, and contact information. Even if the whistleblowing report is made anonymously (i.e., the whistleblower does not disclose their name), we will conduct an investigation to confirm the facts to the extent reasonably possible.
2. When reporting, please provide the following information:
 - (1) The accused (who);
 - (2) The time the act occurred (when);
 - (3) The place where the act occurred (where);
 - (4) The party to whom the act is directed (to whom);
 - (5) The content of the act (what the accused did);
 - (6) The rule(s) violated (what was violated);
 - (7) Supporting materials;

- (8) How you became aware of the act; and
- (9) Whether you have previously reported the same accused or conduct.

Article 6. Basic investigation flow

1. In principle, a whistleblowing report is handled according to these Terms of Use and [the whistleblowing investigation response flow \(PDF\)](#). Notwithstanding the foregoing, in case that there is any conflict between any provision of these Terms of Use and any present or future mandatory law(s) or regulation(s) applicable in the jurisdiction where the whistleblower is located, contrary to which the parties have no legal right to agree, the latter shall prevail. In that event, the affected provision or provisions of these Terms of Use shall be modified only to the extent necessary to comply with the legal requirements and only for as long as such conflict exists.
2. If this Hotline receives a whistleblowing report and is able to contact the whistleblower, this Hotline shall notify the whistleblower of receipt of the whistleblowing report and, after investigation, communicate the result of the investigation.
3. If this Hotline formally accepts the whistleblowing report, this Hotline shall investigate for fact-finding purposes. An investigation may be conducted with the help of the whistleblower and/or a third party. The whistleblower may be asked to provide the information needed for the investigation. When this Hotline completes the investigation, this Hotline will, to a reasonable extent, provide feedback to the whistleblower. If a compliance issue was identified and a corrective measure was taken but the same issue reoccurs, the whistleblower will be asked to contact this Hotline.
4. The investigation of the whistleblowing report may be terminated, or the feedback may not be provided to the whistleblower, if the whistleblower is anonymous and cannot be contacted, if the whistleblower's cooperation is not obtained (including cases where information necessary for investigation is not provided), or if there are impediments to the progress of the investigation.
5. Among the report subject matters stipulated in Article 4, if we receive a whistleblowing report on the Adverse Impacts, we will make efforts to investigate and address such whistleblowing reports through mutual discussions with stakeholders in accordance with the "Guiding Principles on Business and Human Rights" issued by the United Nations.

Article 7. Transferring of whistleblowing report

This Hotline may, depending on the nature of a received whistleblowing report, transfer the whistleblowing report to other hotline(s) or responsible department(s) (including hotline(s) or responsible department(s) of the Canon Group) or to a relevant third party (such as an external organization (outside the Canon Group)).

If the whistleblower's contact information is available, such transfer shall be made with the whistleblower's consent. If the contact information is not available, the transfer may be made without obtaining additional consent of the whistleblower.

"Transfer" hereunder means the delegation and assignment of all authorities, obligations and responsibilities to handle a whistleblowing report, including, but not limited to, receiving and accepting the whistleblowing report, conducting investigations, determining whether a violation has occurred and notifying the whistleblower of the investigation results.

Article 8. Entrusting handling of whistleblowing report

1. This Hotline may entrust all or part of the handling of a whistleblowing report to other responsible department(s) or to relevant third party(ies).

2. When this Hotline entrusts the handling of the whistleblowing report to other department(s) or third party(ies), and it is necessary to share information with such other department(s) or third party(ies) that can identify the whistleblower of the whistleblowing report or disclose specific information obtained from its investigation, this Hotline shall comply with the provisions of Article 9. Any such sharing shall be limited to the minimum necessary information.

Article 9. Confidentiality

1. The person in charge of this Hotline shall maintain confidentiality of the contents of the whistleblowing report, including information that identifies the whistleblower of the whistleblowing report, and of the information obtained by this Hotline during the investigation.
2. Notwithstanding the preceding paragraph, for the purpose of operating the whistleblowing system of the Responsible Business Conduct, (i) in cases where highly necessary investigations cannot be conducted without identifying the whistleblower of a whistleblowing report, (ii) in cases where it is necessary based on law(s) and regulation(s), (iii) in cases where it is necessary to protect the life or body of the whistleblower, or (iv) with the consent of the whistleblower, this Hotline may disclose information that can identify the whistleblower to other person(s) in charge, other department(s), or third party(ies) under the obligation to maintain confidentiality.
3. Notwithstanding Paragraph 1, for the purpose of operating the whistleblowing system of the Responsible Business Conduct, the contents of the whistleblowing report, excluding information that can identify the whistleblower, and information obtained from the investigation for fact-checking purposes (hereinafter "Investigation Information") may be disclosed to other persons in charge, other departments, or third parties, subject to an obligation to maintain confidentiality.
4. Notwithstanding Paragraph 1, this Hotline may abstract or aggregate Investigation Information and use the foregoing information without any obligation to maintain confidentiality.
5. This Hotline will manage materials related to the contents of the whistleblowing report and any Investigation Information as follows:
 - Paper documents will be stored in lockable cabinets.
 - Electronic documents will be stored in folders accessible only to the personnel in charge at this Hotline.

Article 10. Prohibition of dismissal and other retaliation

1. CINC shall not dismiss, demote, discipline, threaten, or otherwise engage in any other disadvantageous treatment against the whistleblower of a whistleblowing report solely because the whistleblower made a whistleblowing report to this Hotline.
2. CINC shall take appropriate measures, as necessary, to ensure that the mere fact of making a whistleblowing report does not adversely affect the work environment of the whistleblower. If the whistleblower experiences disadvantageous treatment or harassment, the whistleblower may contact this Hotline. A person who treats or harasses a whistleblower in a disadvantageous manner may be subject to disciplinary action under the work regulation if such person is an employee of the Canon Group.

Article 11. Disclosure of operational results of our whistleblowing system

The operational results of this Hotline (such as the number of whistleblowing reports) will be disclosed periodically to the extent possible through CINC's internal website and through Canon's Integrated Report, etc.

Article 12. Protection for Hotline Staff

When reporting to this Hotline, cooperating with a Hotline investigation related to a whistleblowing report, or making an inquiry to this Hotline regarding investigation results, a whistleblower shall not engage in any of the following acts specified against this Hotline (Item 8 below relates to acts against this Hotline itself). If we determine that any one of these actions has occurred, we may not accept the whistleblowing report or discontinue the handling of such whistleblowing report. In addition, if the whistleblower is an employee of the Canon Group, the whistleblower may be subject to punishment according to the work regulations of each company in the Canon Group to which the whistleblower belongs.

- (1) An act of intimidation;
- (2) Insults, discrimination, and defamation;
- (3) Degrading behavior;
- (4) Invasion of privacy;
- (5) Harassment;
- (6) Demanding an apology without reasonable grounds;
- (7) Excessive repeated acts of the same request or complaint;
- (8) Slandering this Hotline through SNS (Social Networking Service), the internet, etc.; and
- (9) Apart from the foregoing items, any act that is not considered to be appropriate in accordance with generally accepted standards of social reasonableness.

Article 13. Report to external authority or third-party organization

This Hotline recommends that a person stipulated in Article 2 first make a whistleblowing report to CINC, and allow CINC to handle the matter appropriately. However, such recommendation does not prevent the whistleblower from making a report to an external authority or third-party organization.

Finally, please use and contact this Hotline only if you agree to the above.

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