

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**CANON INC.**

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(Exact name of the registrant as specified in its charter)

JAPAN

001-15122

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(State or other jurisdiction of  
incorporation or organization)

(Commission  
File Number)

30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo

146-8501, Japan

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(Address of principle executive offices)

(Zip code)

Sachiho Tanino, +81-3-3758-2111,  
30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo 146-8501, Japan

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(Name and telephone number, including area code, of the  
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2021 to December 31, 2021.
- Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended December 31, 2021.

## **Section 1 - Conflict Minerals Disclosure**

Established in 1937, Canon Inc. is a Japanese corporation with its headquarters in Tokyo, Japan. Canon Inc. is one of the world's leading manufacturers of office MFDs, plain paper copying machines, laser printers, cameras, inkjet printers, diagnostic equipment and lithography equipment. Canon Inc. earns revenues primarily from the manufacture and sale of these products domestically and internationally.

Canon Inc. and its consolidated companies have been fully aware of the issue of conflict minerals and have been working together with business partners and industry entities to address the issue of conflict minerals.

In response to Rule 13p-1, Canon Inc. conducted a "Reasonable Country of Origin Inquiry" and due diligence based on the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas," for its various products.

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Conflict Minerals Disclosure**

A copy of the Conflict Minerals Report of Canon Inc. for the reporting period from January 1, 2021 to December 31, 2021 is provided as Exhibit 1.01 hereto and is publicly available at:  
<https://global.canon/en/csr/conflict/index.html>

### **Item 1.02 Exhibit**

Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 hereto.

## **Section 2 – Resource Extraction Issuer Disclosure**

### **Item 2.01 Resource Extraction Issuer Disclosure and Report**

Not applicable.

## **Section 3 - Exhibits**

### **Item 3.01 Exhibits**

Exhibit 1.01 - Conflict Minerals Report for the reporting period from January 1, 2021 to December 31, 2021

## SIGNATURES

Pursuant to the requirement of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Canon Inc.  
(Registrant)

/s/ Toshizo Tanaka

Toshizo Tanaka  
Executive Vice President & CFO

Canon Inc.  
30-2, Shimomaruko 3-chome,  
Ohta-ku, Tokyo 146-8501, Japan

Date May 27, 2022

**Canon Inc.**  
**Conflict Minerals Report**  
**For the Period from January 1, 2021 to December 31, 2021**

This Conflict Minerals Report for the period from January 1, 2021 to December 31, 2021, is presented as an exhibit to the Specialized Disclosure Report on Form SD, to comply with Rule 13p-1 under the Securities Exchange Act of 1934.

**1. Introduction (Background to the disclosure of the Conflict Minerals Report)**

Established in 1937, Canon Inc. is a Japanese corporation with its headquarters in Tokyo, Japan. Canon Inc. is one of the world's leading manufacturers of office MFDs, plain paper copying machines, laser printers, cameras, inkjet printers, diagnostic equipment and lithography equipment. Canon Inc. earns revenues primarily from the manufacture and sale of these products domestically and internationally. For details of corporate activities please refer to our annual report filed on Form 20-F.

Canon Inc. is listed on the New York Stock Exchange and is subject to the final rules issued by the United States Securities and Exchange Commission (“**SEC**”) to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“**Dodd-Frank Act**”).

In response to Rule 13p-1, Canon Inc. conducted a “Reasonable Country of Origin Inquiry” (“**RCOI**”) for products manufactured or contracted to manufacture by Canon Inc. and its consolidated subsidiaries (“**Canon**” or “**Canon Group**”) from January 1, 2021 to December 31, 2021 (“**reporting period**”). The inquiry identified four minerals classified as conflict minerals—namely tin, tantalum, tungsten, and gold (“**3TG**”)—that originated in the Democratic Republic of the Congo and adjoining countries (“**covered countries**”) and did not come from recycled or scrap minerals, that are used in some of the parts or materials that make up Canon Group's products. Further, Canon Inc. conducted due diligence on the source and chain of custody of 3TG (“**due diligence**”) identified as originating from covered countries.

**2. Application of Conflict Minerals Report on Canon and products subject to disclosure**

As of December 31, 2021, Canon Inc. had 329 consolidated subsidiaries, of which 55

subsidiaries manufactured products or contracted to manufacture products in the reporting period for which 3TG were necessary to the functionality and production, and were subject to the reporting requirements under the SEC’s final rules regarding the Dodd-Frank Act. In total, 56 companies of the Canon Group, including Canon Inc. and those 55 consolidated subsidiaries conducted the RCOI. The subsidiaries that conducted the RCOI include certain marketing companies that contracted with manufacturers outside the Canon Group to manufacture items for sale outside the Canon Group.

The business operations of Canon can be divided into the following four categories: the Printing Business Unit, the Imaging Business Unit, the Medical Business Unit and the Industrial and Others Business Unit.

The Printing Business Unit includes office MFDs, laser printers, and inkjet printers for personal and office use as well as production print products for print professionals. The Imaging Business Unit includes digital cameras as well as lenses and various related accessories. It also includes compact photo printers, network cameras, digital cinema cameras, and broadcast HDTV lenses. The Medical Business Unit includes Computed tomography (CT), Magnetic resonance imaging (MRI), ultrasound, X-ray systems, and clinical laboratory systems, as well as digital radiography (DR) systems and ophthalmic equipment. The Industrial and Others Business Unit includes semiconductor lithography equipment, flat panel display (FPD) lithography equipment, organic light-emitting diode (OLED) panel manufacturing equipment.

In each of these units, electronic components and substrates which contain 3TG are used in the majority of products manufactured by or contracted to manufacture by Canon.

Canon Group purchases raw materials, parts and components which include 3TG and manufactures products. Canon Group is located downstream in the 3TG supply chain, and does not directly purchase 3TG from mines. Therefore, Canon Group had to rely on information provided by the first-tier suppliers to the Canon Group (“**first-tier suppliers**”) in identifying the source country of the 3TG. Many of the first-tier suppliers also have to rely on information from their upstream suppliers.

### **3. Basic principles regarding response to conflict minerals**

Canon Inc. established the “Basic Approach of the Canon Group Regarding Conflict Minerals” in September 2012. Canon Inc. expanded the scope of covered minerals and risks in 2020 and updated the policy as the “Canon Group Basic Policy on Responsible Minerals Sourcing”. This has been published on Canon Inc.’s official website and applied to the entire Canon Group.

URL: <https://global.canon/en/csr/conflict/policy.html>

#### 4. RCOI and Due Diligence

The design of Canon's RCOI and due diligence measures is in conformity with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (third edition)" ("**OECD Guidance**"). Canon took the steps described below in accordance with the five steps laid out in the OECD Guidance.

##### a. Step 1: Establish strong company management systems

- In order to respond to the conflict minerals situation, Canon established a cross-functional Conflict Minerals Response Project Team ("**Project Team**") in its headquarters under the direction of a representative director in charge (Executive Vice President & CFO) in December 2010. Moreover, Canon designated a person in charge of conflict minerals in each of its group companies that manufacture or contract to manufacture products. The Project Team currently operates as the Working Group on Responsible Minerals Sourcing ("**Working Group**").
- As stated above, Canon Inc. established the "Canon Group Basic Policy on Responsible Minerals Sourcing".
- Canon established the "Guidelines for Responsible Minerals Sourcing" that clarified the responsible divisions and the framework for handling responsible minerals sourcing issues as well as the survey process, for the persons involved in the Canon Group.
- In July 2021, Canon Inc. summoned the persons in charge of responsible minerals sourcing for Canon Group's domestic subsidiaries that manufacture or contract to manufacture products and held a meeting to share the results of the 2020 minerals survey and discuss Canon's policies for the survey of 2021. Moreover, for the persons in charge of responsible minerals sourcing matters for overseas subsidiaries, Canon Inc. shared information by e-mail and web conference.
- Canon created and distributed the Responsible Minerals Sourcing Survey Manual to the first-tier suppliers.
- Canon requested the first-tier suppliers to sign and submit written confirmation ("**Certificate of Consent**") of their agreement and cooperation with Canon's "Canon Group Basic Policy on Responsible Minerals Sourcing" and their agreement to take an action for appropriate measures should any significant risks associated with mineral sourcing be found in the supply chain.

- Using its Minerals Information Management System, Canon Inc. linked survey responses to product information, conducted product-level assessments, and stored the assessment results in a database, except for such products as handled by newly joined subsidiaries. Internal rules require that data records be retained for at least five years.
- Canon Inc. is a member of the Responsible Minerals Trade Working Group (“**RMTWG**”) of the Japan Electronics and Information Technology Industries Association (“**JEITA**”). As part of its initiatives, the RMTWG provided the documents and videos related to the responsible minerals sourcing for suppliers in supply chains in the electrical and electronics industry. Step 3 below provides details of the industry initiatives on responsible minerals sourcing that Canon Inc. participates in.
- As an early-warning risk-awareness system specified in the OECD Guidance, Canon Inc. established a grievance mechanism — “Contact Point for Reporting Concerns Regarding Conflict Mineral Issues” (renamed in 2020 “Procedure for the Submission of Concerns Regarding Minerals Risk”) — on its official website in 2015. No reports from employees, suppliers, or other stakeholders were received by the contact point in 2021.

URL: <https://global.canon/en/contact/conflict/conflict-form-e.html>

**b. Step 2: Identify and assess risks in the supply chain**

- Canon designed a framework to identify each of the parts and materials used in the products that it manufactured or contracted to manufacture. Canon used its production and shipping management system, which includes bills of materials for products and also used its procurement system, to identify parts and materials required in products planned for production and shipping between January and the end of December 2021. (Canon Group companies not using such system made use of a similar method to identify parts and materials.) Canon then carried out the RCOI on the first-tier suppliers handling the identified parts and materials.
- For the RCOI, Canon used the RMI Conflict Minerals Reporting Template Revision 6.1 (“**CMRT**”). The CMRT is published by the Responsible Minerals Initiative (“**RMI**”), one of the programs of the Responsible Business Alliance (“**RBA**”). Canon requested the 3,202 first-tier suppliers that were identified as possibly using 3TG to report their status of 3TG using the CMRT. Suppliers that were not using 3TG for their parts and materials had the option of reporting their status through an alternative method, instead of using the CMRT.

- In addition to the RCOI described above, Canon conducted due diligence examinations of first-tier suppliers that reported the use of 3TG originating from covered countries. Suppliers who reported 3TG smelters were requested to fill in Canon's own "Smelter Risk Check Form" and if they reported any smelters that did not meet the conformant or active smelters in the RMI's audit program, they were also asked to submit the estimated schedule to mitigate the risks on such non-conformant or non-active smelters.
- Canon requested replies from the first-tier suppliers who did not respond by the closing date of the response.
- Canon Inc. verified the replies submitted by first-tier suppliers (for any incomplete answers or errors) using a proprietary reply-processing tool. When necessary, Canon requested resubmissions from first-tier suppliers.
- As of April 28, 2022, Canon had received responses from 92 percent of all first-tier suppliers surveyed.
- Canon compared the smelters or refiners ("SORs") identified through the RCOI against the list of the SORs which have been validated to be conformant to the Responsible Minerals Assurance Process ("RMAP"), the audit program of the RMI, as published by the RMI. The RMI implements cross recognition with the London Bullion Market Association (LBMA) and the Responsible Jewellery Council (RJC).
- As a new initiative during the reporting period, Canon sent a letter in September 2021 to request the first-tier suppliers not to use the SORs designated by Canon's customers as high-risk SORs and non-conformant SORs under the RMAP in order to strengthen risk management. Further, Canon analyzed the responses of the "Smelter Risk Check Form" from the first-tier suppliers. Among the first-tier suppliers who had not been taking action to address risks, Canon approached those that Canon considered might carry particular risk and requested them to take measures to mitigate risks.

**c. Step 3: Design and implement a strategy to respond to identified risks**

- The head of the Working Group reported the progress of responsible minerals sourcing activities to the representative director in charge.
- Moreover, the Working Group reported in November 2021 on its progress to relevant directors and executive officers of Canon Inc. as well as the presidents of the relevant domestic and overseas subsidiaries by distributing the explanatory material.



- Canon Inc. is a key member of JEITA's RMTWG. The RMTWG is allied with the RMI, which plays the leading role in the response to responsible minerals sourcing. Canon Inc. has held the role of co-chair of the RMTWG since 2013. Canon Inc. has also served as team leader of the RMTWG's Smelter Support Team since 2015.
- Canon Inc. participates in the Japan Conflict-Free Sourcing Working Group (CFSWG), a joint initiative by JEITA's RMTWG and major Japanese automobile manufacturers, and serves as the CFSWG vice-chair.
- In addition to the above activities, Canon Inc. has been a member of the RMI since April 2015. Its membership code is "CNON." Canon Inc. assists RMI activities as a corporate member of the RMI.

**d. Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices**

- As a RMI member, Canon Inc. supports audits under the RMAP carried out by the RMI on SORs.

**e. Step 5: Report annually on supply chain due diligence**

- In accordance with the Dodd-Frank Act and the SEC's final rules, on or before May 31, 2022, Canon Inc. plans to file a Form SD and Conflict Minerals Report (this report) with the SEC, and plans to publish the same information on its official website.
- Since 2011, Canon Inc. has been reporting its activities in response to responsible minerals sourcing in its annually published Sustainability Report.

**5. Survey results for the 2021 calendar year**

**Result of RCOI and due diligence**

- Canon conducted the RCOI on 3,202 first-tier suppliers that possibly use 3TG. Canon conducted further due diligence on first-tier suppliers which reported the use of 3TG from the covered countries.
- In cases where 3TG originating from covered countries were used, Canon received some responses indicating the minerals in question had been sourced from SORs that are conformant with the RMAP.
- Canon analyzed the information on the SORs mentioned in the responses from the supply chain through the RCOI, with reference to the RMI's SOR

information. The RMI classifies SORs based on the auditing status. The website of the RMI provides information of the auditing status under the RMAP.

<http://www.responsiblemineralsinitiative.org/>

- As of January 13, 2022, 239 SORs in Canon supply chain were identified as RMAP conformant and 20 SORs were identified as Active in the RMAP through our review. The remaining 78 SORs were neither RMAP conformant nor Active in the RMAP. Appendices 1-1, 1-2 and 1-3 provide lists of these SORs.
- Canon was unable to determine whether the remaining entities reported by the first-tier suppliers as SORs were truly SORs.
- Due to inadequate information from its supply chains, Canon was unable to determine the country or region of origin of many 3TG used in Canon Group products.
- Appendix 1-4 lists examples of 3TG countries and regions of origin first-tier suppliers reported to Canon through CMRT responses.
- Based on the results of the RCOI and due diligence mentioned above, Canon was unable to determine whether the 3TG used for the products of the Canon Group financed or benefitted armed groups in the covered countries.

## **6. Efforts to determine the mine or location of origin of 3TG with the greatest possible specificity and risk mitigation**

The following efforts to determine the mine or location of origin of 3TG with the greatest possible specificity are planned to be implemented from 2022 onwards.

- Canon will continue promoting verification operations of high-risk first-tier suppliers in accordance with Canon's Guidelines for Responsible Minerals Sourcing.
- Canon Inc. will continue its participation at JEITA's RMTWG, CFSWG and RMI, and support activities to reduce risks in entire supply chains.

The EU Conflict Minerals Regulation (Regulation (EU) 2017/821) came into operation in January 2021. The EU Conflict Minerals Regulation does not limit due diligence to covered countries in Africa. In response, the CMRT, the industry standard reporting template for conflict minerals, was revised in May 2020 as Revision 6.01 and new Question 4: "Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas?" was added to the template. Although Canon is not subject to the EU Conflict Minerals Regulation, Canon has conducted due diligence not only in the covered countries stipulated in the Dodd-Frank Act but also in the "conflict-affected and high-risk areas" stipulated in the

OECD Guidance by using the CMRT as revised since the 2020 survey.

## **7. Independent monitoring**

- KPMG AZSA Sustainability Co., Ltd. conducted an independent private sector audit of this report. The audit assessed whether the due diligence framework Canon designed conforms to the OECD Guidance's due diligence framework and whether the due diligence description in this report is consistent with the actual measures Canon undertook. The independent assurance report is attached in Appendix 2.

## **Forward-Looking Statements**

This report contains not only past and present facts about Canon, but also future forecasts based on plans, prospects, management policies and strategies as of the publication date. These future forecasts are assumptions or estimations based on information available at the time the report was prepared. Due to a range of variables, however, the results or circumstances of our future business activities may vary from the forecasts contained herein.

**Appendix 1.**

**1. List of SORs that are believed to be in Canon’s supply chain who were RMAP conformant as of January 13, 2022. (The notation of SOR names and locations is in accordance with the information provided by RMI.)**

<b>Metal</b>	<b>SORs</b>	<b>Country/Regions</b>
Gold	L'Orfebre S.A.	ANDORRA
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Marsam Metals	BRAZIL
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Royal Canadian Mint	CANADA
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Shandong Gold Smelting Co., Ltd.	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	SAFINA A.S.	CZECHIA
Gold	SAAMP	FRANCE
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	Aurubis AG	GERMANY
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Germany GmbH Co. KG	GERMANY
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Bangalore Refinery	INDIA
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA

Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	8853 S.p.A.	ITALY
Gold	Chimet S.p.A.	ITALY
Gold	Italpreziosi	ITALY
Gold	Safimet S.p.A	ITALY
Gold	T.C.A S.p.A	ITALY
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	Chugai Mining	JAPAN
Gold	Dowa	JAPAN
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Japan Mint	JAPAN
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	REMONDIS PMR B.V.	NETHERLANDS
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES

Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	JSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Boliden AB	SWEDEN
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	PAMP S.A.	SWITZERLAND
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Valcambi S.A.	SWITZERLAND
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Istanbul Gold Refinery	TURKEY
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	Materion	UNITED STATES OF AMERICA
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	FIR Metals & Resource Ltd.	CHINA

Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Yancheng Jinye New Material Technology Co., Ltd.	CHINA
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	TANIOBIS GmbH	GERMANY
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	KEMET de Mexico	MEXICO
Tantalum	Meta Materials	NORTH MACEDONIA, REPUBLIC OF
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	TANIOBIS Co., Ltd.	THAILAND
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V.	BELGIUM
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Fabrica Auricchio Industria e Comercio Ltda.	BRAZIL
Tin	Magnu's Mineraiis Metais e Ligas Ltda.	BRAZIL
Tin	Melt Metais e Ligas S.A.	BRAZIL

Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	Soft Metais Ltda.	BRAZIL
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Babel Surya Alam Lestari	INDONESIA
Tin	PT Bangka Serumpun	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Rajawali Rimba Perkasa	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	Dowa	JAPAN
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Minsur	PERU
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Fenix Metals	POLAND
Tin	Luna Smelter, Ltd.	RWANDA
Tin	Metallo Spain S.L.U.	SPAIN
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND



Tin	Thaisarco	THAILAND
Tin	Alpha	UNITED STATES OF AMERICA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Cronimet Brasil Ltda	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xincheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION

Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tungsten	Masan High-Tech Materials	VIET NAM

**2. List of SORs that are believed to be in Canon’s supply chain who were RMAP Active as of January 13, 2022. (The notation of SOR names and locations is in accordance with the information provided by RMI.)**

<b>Metal</b>	<b>SORs</b>	<b>Country/Region</b>
Gold	C.I Metales Procesados Industriales SAS	COLOMBIA
Gold	Sancus ZFS (L’Orfebre, SA)	COLOMBIA
Gold	WEEEREFINING	FRANCE
Gold	Augmont Enterprises Private Limited	INDIA
Gold	GGC Gujrat Gold Centre Pvt. Ltd.	INDIA
Gold	Alexy Metals	UNITED STATES OF AMERICA
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Super Ligas	BRAZIL
Tin	Yunnan Tin Company Limited	CHINA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	PT Mitra Sukses Globalindo	INDONESIA
Tin	PT Timah Nusantara	INDONESIA
Tin	Novosibirsk Processing Plant Ltd.	RUSSIAN FEDERATION
Tin	CRM Synergies	SPAIN
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRAZIL
Tungsten	GEM Co., Ltd.	CHINA
Tungsten	NPP Tyazhmetprom LLC	RUSSIAN FEDERATION
Tungsten	OOO “Technolom” 1	RUSSIAN FEDERATION
Tungsten	OOO “Technolom” 2	RUSSIAN FEDERATION

**3. List of SORs that are believed to be in Canon’s supply chain who were neither RMAP conformant nor RMAP Active as of January 13, 2022. (The notation of SOR names and locations is in accordance with the information provided by RMI.)**

<b>Metal</b>	<b>SORs</b>	<b>Country/Region</b>
Gold	Industrial Refining Company	BELGIUM
Gold	Value Trading	BELGIUM
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHINA
Gold	Lingbao Gold Co., Ltd.	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA
Gold	Shandong Humon Smelting Co., Ltd.	CHINA
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CHINA
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY
Gold	Gold Coast Refinery	GHANA
Gold	CGR Metalloys Pvt Ltd.	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 1)	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 2)	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 3)	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 4)	INDIA
Gold	JALAN & Company	INDIA
Gold	Kundan Care Products Ltd.	INDIA
Gold	MD Overseas	INDIA
Gold	Sai Refinery	INDIA
Gold	Shirpur Gold Refinery Ltd.	INDIA
Gold	Sovereign Metals	INDIA
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF

Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF
Gold	TSK Pretech	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	State Research Institute Center for Physical Sciences and Technology	LITHUANIA
Gold	Modeltech Sdn Bhd	MALAYSIA
Gold	Sellem Industries Ltd.	MAURITANIA
Gold	Caridad	MEXICO
Gold	Morris and Watson	NEW ZEALAND
Gold	K.A. Rasmussen	NORWAY
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION
Gold	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	Sudan Gold Refinery	SUDAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	African Gold Refinery*	UGANDA
Gold	Dijllah Gold Refinery FZC	UNITED ARAB EMIRATES
Gold	Fujairah Gold FZC	UNITED ARAB EMIRATES
Gold	International Precious Metal Refiners	UNITED ARAB EMIRATES
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	Metallix Refining Inc.	UNITED STATES OF AMERICA
Gold	Pease & Curren	UNITED STATES OF AMERICA
Gold	QG Refining, LLC	UNITED STATES OF AMERICA
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CHINA
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Precious Minerals and Smelting Limited	INDIA
Tin	CV Ayi Jaya	INDONESIA
Tin	PT Aries Kencana Sejahtera	INDONESIA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	Pongpipat Company Limited	MYANMAR
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM

Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	VQB Mineral and Trading Group JSC	VIET NAM
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	Artek LLC	RUSSIAN FEDERATION

\* On March 17, 2022, the U.S. Department of the Treasury added this gold refinery in Uganda to the OFAC's Specially Designated Nationals (SDN) List. The Canon Group has no direct business with the refinery. Through our due diligence examination, we identified our first-tier suppliers who reported utilizing the Ugandan refinery in their supply chain. We will continue to confirm if the refinery actually exists on our supply chain and eliminate it once it is found.

**4. Examples of the countries and regions of origin from which the SORs listed in Appendix 1-1, 1-2 and 1-3 are believed to have sourced 3TG**

Andorra	France
Argentina	Gambia
Armenia	Georgia
Australia	Germany
Austria	Ghana
Azerbaijan	Greece
Bahamas	Guatemala
Belgium	Guinea
Bolivia	Guyana
Botswana	Honduras
Brazil	Hungary
Bulgaria	Iceland
Burkina Faso	India
Burundi	Indonesia
Cameroon	Ireland
Canada	Israel
Chile	Italy
China	Japan
Colombia	Jordan
Cote d'Ivoire	Kazakhstan
Croatia	Kenya
Cyprus	Korea, Republic of
Czech Republic	Laos
Democratic Republic of the Congo	Latvia
Dominican Republic	Lebanon
Ecuador	Liberia
Egypt	Libya
El Salvador	Liechtenstein
Estonia	Lithuania
Ethiopia	Luanda
Fiji	Luxembourg
Finland	Madagascar

Malaysia	Senegal
Mali	Serbia
Malta	Sierra Leone
Mauritania	Singapore
Mauritius	Slovakia
Mexico	Slovenia
Mongolia	Solomon Islands
Morocco	South Africa
Mozambique	Spain
Myanmar	Sudan
Namibia	Suriname
Netherlands	Sweden
New Caledonia	Switzerland
New Zealand	Taiwan
Nicaragua	Tajikistan
Niger	Tanzania
Nigeria	Thailand
Norway	Togo
Pakistan	Trinidad and Tobago
Panama	Tunisia
Papua New Guinea	Turkey
Peru	Uganda
Philippines	United Arab Emirates
Poland	United Kingdom
Portugal	United States of America
Puerto Rico	Uruguay
Russian Federation	Uzbekistan
Rwanda	Viet Nam
San Marino	Zambia
Saudi Arabia	

## Appendix 2.

### INDEPENDENT ASSURANCE REPORT

To the Board of Directors and Stockholders of Canon Inc.

We have undertaken a reasonable assurance engagement of:

- management's assertion, included in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2021, that the design of Canon Inc.'s (the "Company") due diligence framework is in conformity with the criteria set forth in the Organisation of Economic Co-Operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016 ("OECD Due Diligence Guidance"), and
- whether the Company's description of the due diligence measures it performed, as set forth in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2021, is consistent, in all material respects, with the due diligence process that the Company undertook.

Management is responsible for the design of the Company's due diligence framework and the description of the Company's due diligence measures set forth in the Conflict Minerals Report, and performance of the due diligence measures. Our responsibility is to express an opinion on the design of the Company's due diligence framework and on the description of the due diligence measures the Company performed, based on the procedures we have performed.

Our reasonable assurance engagement was conducted in accordance with 'International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information', issued by the International Auditing and Assurance Standards Board, and the standards applicable to performance audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, and, accordingly, included examining, on a test basis, evidence about the design of the Company's due diligence framework and the description of the due diligence measures the Company performed, and performing such other procedures as we considered necessary in the circumstances. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our reasonable assurance engagement was not conducted for the purpose of evaluating:

- The consistency of the due diligence measures that the Company performed with either the design of the Company's due diligence framework or the OECD Due Diligence Guidance;
- The completeness of the Company's description of the due diligence measures performed;
- The suitability of the design or operating effectiveness of the Company's due diligence process;
- Whether a third party can determine from the Conflict Minerals Report if the due diligence measures the Company performed are consistent with the OECD Due Diligence Guidance;
- The Company's reasonable country of origin inquiry (RCOI), including the suitability of the design of the RCOI, its operating effectiveness, or the results thereof; or
- The Company's conclusions about the source or chain of custody of its conflict minerals, those products subject to due diligence, or the DRC Conflict Free status of its products.

Accordingly, we do not express an opinion or any other form of assurance on the aforementioned matters or any other matters included in any section of the Conflict Minerals Report other than section 4.

In our opinion,

- the design of the Company's due diligence framework for the reporting period from January 1 to December 31, 2021, as set forth in section 4 of the Conflict Minerals Report is in conformity, in all material respects, with the OECD Due Diligence Guidance, and
- the Company's description of the due diligence measures it performed as set forth in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2021, is consistent, in all material respects, with the due diligence process that the Company undertook.

We have complied with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. In accordance with International Standard on Quality Control 1, we maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



/s/ Kazuhiko Saito  
Kazuhiko Saito, Partner, Representative Director  
KPMG AZSA Sustainability Co., Ltd.  
Tokyo, Japan  
May 27, 2022

Notes to the Reader of Independent Assurance Report:

This is a copy of the Independent Assurance Report and the original copies are kept separately by the Company and KPMG AZSA Sustainability Co., Ltd.