

**CODE OF  
ETHICS AND CONDUCT  
for Suppliers, Customers,  
and Business Partners**

**Canon**

May/2025



This Code of Ethics and Conduct establishes the principles and guidelines that guide our actions and decisions, aiming to build sustainable partnerships and promote an ethical and responsible work environment, being applicable to all Suppliers, Customers, Business Partners, and other interested parties that act on behalf of or through Canon do Brasil.

This Code is mandatory, and the conduct presented here must be adopted by everyone. In this way, we will promote a work environment in which respecting values is a matter of principle, developing our business successfully.

Canon Brazil requests that its Suppliers, Customers and Business Partners understand the intent of this Code and cooperate in promoting sustainable purchasing activities.

Canon Brazil, as well as the Canon Group in all countries in which it operates, seeks to maintain the highest standards of ethics and integrity in all its operations and business relationships. Among these standards, the following are very important Corporate Principles:

**Integrity:**We act with honesty, transparency and ethics in all our interactions.

**Respect:**We value diversity and promote an inclusive environment, free from discrimination and harassment.

**Responsibility:**We comply with our legal and regulatory obligations, and take responsibility for our actions and impacts.

**Sustainability:**We seek practices that protect the environment and contribute to social and economic development.

**Kyosei:**We seek to live and work together for the common good, contributing to a better society.

Based on these Corporate Principles, we want to make a positive impact on the lives of the people we interact with, whether they are customers, suppliers or business partners.

At Canon Brazil, we seek to comply with the laws and regulations applicable to our country, respecting human rights, including the prohibition of forced and child labor, ensuring a safe and healthy work environment, strengthening our relationship with environmental protection and seeking sustainability in our operations.

### **Procurement Policy**

Canon is enhancing its cooperative relationships with suppliers, customers and business partners through the implementation of the EQCD concept<sup>\*1</sup>, which stipulates the timely delivery of high-quality products at reasonable prices to customers around the world while taking the environment into consideration.

*<sup>\*1</sup> EQCD Concept: This is Canon's basic product development policy. "E" stands for environment: Companies are not qualified to manufacture goods if they are unable to*  
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*ensure environmental protection. "Q" stands for quality: Companies are not qualified to market goods if they are unable to provide quality products. "C" and "D" stand for cost and delivery: Companies are not qualified to compete if they are unable to meet cost and delivery requirements.*

Canon has formulated and widely published its Procurement Policy and is striving to build good relationships with suppliers, business partners and customers by deepening their understanding of Canon's basic stance towards procurement.

In line with its corporate philosophy of *kyosei*, Canon conducts procurement activities that give due consideration to society while continually taking steps to further evolve its environmentally friendly green procurement practices<sup>\*2</sup>.

*<sup>\*2</sup> Green procurement: Prioritize the procurement of materials and products that have a lower environmental impact (→P70).*

Adhering to its corporate philosophy of ***kyosei***, Canon aims, as a truly global enterprise, to contribute to the prosperity and well-being of the world by developing, manufacturing and marketing useful products, increasing profits and achieving solid corporate growth and development.

Canon takes a global perspective in purchasing quality, appropriately priced merchandise in a timely manner. This facilitates product quality improvements and price reductions, and positions us to work with our suppliers to meet customer needs.

1. We comply with all applicable laws and regulations, as well as corporate ethics, and operate in a manner that protects the environment.
2. We are open to all suppliers and promote fair and free competition, in accordance with the principles of good faith and trust.
3. We improve manufacturing through mutual growth with reliable, quality suppliers who are selected through a fair evaluation process.

### **Fair and Transparent Negotiations - Enhancing Compliance in Procurement**

Canon not only complies with procurement laws and regulations globally, but also ensures complete fairness and transparency in dealings with its suppliers.

Specifically, the Code of Conduct stipulates appropriate actions that individuals in charge of procurement, as well as executives and employees responsible for contracting, should keep in mind to maintain high standards when it comes to legal compliance and corporate ethics.

Furthermore, Canon's business processes are uniform across its global network, based on a common set of detailed rules on procurement practices in force for Canon Group companies both inside and outside Brazil and Japan.

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To ensure consistency and uniformity across the company, special internal controls sections have been established within Canon Brazil to maintain rules, monitor compliance and provide training for employees.

### **Canon's Supply Chain and Fulfilling its Social Responsibility**

In recent years, the environment, human rights and labor issues have been topics of increasing attention, giving rise to questions from various stakeholders about Canon's social responsibility initiatives across its supply chain.

According to media reports, concerns about manufacturers' social responsibility stem from the large number of manufacturing companies in sectors such as sportswear, apparel, and electronics that outsource their sewing, assembly, and manufacturing operations to external factories. In addition, the social responsibility expected of manufacturers has expanded in scope to include large, medium, and small suppliers that supply parts and materials to factories.

Canon attaches great importance to manufacturing, engaging in the assembly of products as well as the production of certain components, parts and materials in its own plants, factories and manufacturing companies of the Canon Group that bear the Canon name and are owned directly or indirectly by Canon Inc. The Canon Group's manufacturing companies are located in countries and regions including Japan, China, Taiwan, Malaysia, Thailand, the Philippines, Vietnam, the United States and Europe, and supply Canon products to Canon Inc. and companies, including subsidiaries and marketing affiliates of the Canon Group, which includes Canon do Brasil. These manufacturing companies directly employ a substantial number of employees and are managed by Canon Inc., which acts as the parent company of the Canon Group.

Canon Group manufacturing companies conduct their business in accordance with the Group's policies on matters such as human rights, labor, environment, legal compliance, purchasing and safety, including the Canon Group Code of Ethics and Conduct and the Canon Group Environmental Charter. When necessary, Canon Inc.'s headquarters divisions, product operations and audit divisions verify the situation at the Group companies as a whole, whether in Japan or overseas, from the perspective of internal controls and risk management.

Canon Group offices, factories and manufacturing companies are engaged in partnerships with several thousand suppliers not affiliated with the Canon Group, from whom they purchase a considerable number of components, such as electronic parts, mechanical parts, assemblies and materials. The purchasing divisions of Canon Inc. headquarters and the Group's manufacturing companies periodically review and assess the social responsibility of these suppliers. In particular, Canon do Brasil may choose to terminate business with suppliers if they fail to comply with laws and regulations covering areas such as human rights and labor.

In 2018, Canon established the Canon Supplier Guidelines to clarify the social responsibility standards that suppliers must follow.

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Among the aspects of social responsibility, child labor and forced labor in particular are areas of growing concern. Within the scope of our 2018 survey of Canon Group companies and suppliers, no issues regarding child labor or forced labor were found.

### **Canon Supplier Guidelines**

In accordance with Canon Group and Canon Brazil Policies, we have established Canon Supplier Guidelines to promote procurement activities that fully take into account social needs. Accordingly, we request that our suppliers undertake the following initiatives:

#### **I. Consideration of human rights, labor and employee health and safety**

(1) Respect the fundamental human rights of employees and do not discriminate against them on the basis of factors such as race, nationality, gender, religion and creed. (2) Strive to utilize diverse human resources. (3) Do not engage in child labor or forced labor (including human trafficking). (4) Promote sincere dialogue between employees and management in accordance with the laws and regulations of the country/region of location. (5) Pay employees wages equal to or higher than the legally required wages in accordance with the laws and regulations of the country/region of location. (6) Prevent excessive overtime and grant adequate holidays. (7) Ensure occupational health and safety in the workplace and prevent occupational accidents.

#### **II. Sound and fair business activities**

(1) Comply with the laws, regulations and social norms of each country and region where business activities are conducted.

(2) Not to carry out acts that obstruct fair, transparent and free competition.

(3) Manage and protect confidential information and personal information.

(4) Strive to avoid infringement of third party intellectual property rights.

(5) Ensure strict commercial security control in accordance with the laws and regulations of the country/region of location.

(6) Not to engage in corruption in all its forms, including bribery.

(7) Strive to avoid complicity in armed insurgencies or anti-social forces.

(8) Strive to disclose relevant and accurate corporate information.

#### **III. Environmental preservation**

(1) Comply with the Environmental Standards established by Canon.

(2) Strive to minimize environmental impact through initiatives aimed at conserving energy, conserving resources, eliminating hazardous substances and preserving biodiversity.

#### **IV. Ensuring the continuity of corporate and business activities**

- (1) Strive to maintain a high level of quality, cost, delivery and technical aspects.
- (2) Provide safe and secure products, parts, materials, services, etc.

#### **V. Request for cooperation from your suppliers**

(1) Request that its suppliers cooperate with social responsibility initiatives, including those concerning human rights, labor, safety, legal compliance, environment and product quality/safety.

#### **Cooperation with Suppliers**

Canon conducts “business trend briefings” for suppliers in each operating unit of Canon Inc. and each production unit of the Group, soliciting their understanding of procurement policies and cooperation with business plans. In other initiatives, in 2018 Canon Inc. held the Procurement Policy Explanation Seminar to directly communicate Canon’s procurement policy and report on its activities to our key suppliers.

#### **Addressing the Issue of Conflict Minerals**

Certain minerals—notably tantalum, tin, gold, and tungsten—that originate in the Democratic Republic of the Congo (DRC) and neighboring countries in Africa are used in many industrial products through global supply chains. Trade in some of these minerals is alleged to be funding armed groups in the DRC and neighboring countries that are instigating serious human rights abuses, environmental destruction, and illegal mining. These are termed “conflict minerals.”

In response, the United States enacted legislation requiring listed companies to confirm that conflict minerals that could finance these armed groups are not being used in their supply chains, and to provide related public disclosures. The legislation came into effect in January 2013.

To ensure that customers can use its products with peace of mind, not only in Brazil, Canon is working closely with business partners and industry groups to avoid the use of conflict minerals that could fund armed groups. As a listed company, Canon is required to file an annual Conflict Minerals Report with the U.S. Securities and Exchange Commission (SEC) by the end of May, detailing the status of the Canon Group’s activities to address the issue of conflict minerals.

#### **Due diligence**

Canon investigates the countries of origin of conflict minerals and exercises due diligence following the OECD Guidelines on Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidelines) published by the Organization for Economic Co-operation and Development (OECD).

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Canon identifies any products that may contain any of the four minerals and researches its suppliers to trace the origin of the minerals back through its supply chain to the parts and materials of the identified products. Canon then exercises due diligence to identify any risk of armed group financing related to conflict minerals.

Within the scope of the responses, there was nothing to clearly suggest that the Canon Group's purchase of parts and materials contributed to the financing of armed groups, and Canon has been working hard to improve the accuracy and efficiency of its research.

Before hiring a supplier, business partner or customer, Canon Brazil performs a Legal and Financial Due Diligence to ensure that its business is conducted safely. Among the research carried out are:

- Financial situation
- Business continuity management (BCM) in case of emergency
- Environmental conservation activities
- Conflict Minerals Compliance
- Corporate ethics (legal compliance, product safety, management of confidential information, human rights, labor, occupational health and safety, and protection of intellectual property rights, etc.)

Acting ethically in business, fighting corruption, bribery and money laundering, avoiding conflicts of interest, maintaining confidentiality of information, safeguarding institutional information, promoting diversity and equal treatment, preventing internal fraud and deviations from procedures is what drives us to make Canon a better company.

It is important to emphasize that failure to comply with the Code will lead to the application of penalties that may include penalties, such as the termination of contracts signed with Customers, Suppliers and/or Business Partners of Canon do Brasil, in addition to legal liabilities.

### **Relationships with our customers**

Canon Brazil's customers are the focus of everything we do and we strive to work daily to make the dreams of every Brazilian consumer come true.

Our focus is on continuously improving the customer experience in our sales and service channels and in after-sales.

We value our customers' opinions and feelings and do not encourage them to consume anything they do not want.

We have customer service channels prepared to listen to customers and to respond attentively to their requests, complaints and suggestions.

We guarantee compliance with the Consumer Protection Code and all laws and regulatory instruments applicable to our business model.

## **Relationships with our suppliers and business partners**

It is part of our business to nurture good relationships with our suppliers and partners and to this end we take care of both our rights and obligations and theirs, always acting ethically and transparently, regardless of the service or product, and in accordance with current laws.

Always seeking the best for the development of our business, the choice of these partners must meet the needs of both companies, free from any conflict of interest. We provide all employees with clear information, so that everyone can make their decisions and carry out hiring strictly in accordance with Canon Brazil's internal policies.

This Code of Ethics and Conduct is in line with the guidelines of Canon Brazil's Anti-Corruption Policy, available at <https://www.canon.com.br/download/bloco/conteudo/item/44778/politicaanticorruptaocanondobrasil.pdf>

## **Report Inappropriate Behavior**

If you notice that there is something suspicious in the commercial relations between Canon do Brasil and any of its customers, business partners or suppliers, we kindly ask that you use the reporting channel available at <https://cloud.canondigital.com.br/integrity> to make your report, which can be done anonymously or not.

Cases of non-compliance with the guidelines in the Code of Ethical Conduct must be reported directly and exclusively to the Canon Brazil Whistleblower Channel. All issues raised to the channel will be treated with a guarantee of impartiality, secrecy and confidentiality.

Canon Brazil reinforces that it has a non-retaliation policy and will not punish you for making a report in good faith. If you witness or suspect something, report it.

This Code is a guide to help us make the best decisions.

If you have any questions about how to act in any situation, please contact us through the Integrity Program, by email: [integrity@cusa.canon.com](mailto:integrity@cusa.canon.com) or through the form available at <https://www.loja.canon.com.br/pt/canonbr/programa-integridade>