



KONICA MINOLTA

# SUPPLIER

## CODE OF CONDUCT

Date: 23.11.2023

Version: 2.0

## CONTENTS

1. Introduction.....	5
2. Purpose and Scope.....	5
3. People.....	5
3.1 Voluntary Employment.....	6
3.2 Child Labour & Young Workers .....	6
3.3 Working Hours.....	6
3.4 Wages and Benefits.....	6
3.5 Humane Treatment.....	7
3.6 Freedom of Association and Collective Bargaining .....	7
3.7 Compliance with Modern Slavery Act 2015.....	7
3.8 Anti-discrimination .....	8
3.9 Equality, Diversity and Inclusion.....	8
4. Health and Safety .....	8
4.1 Occupational Safety .....	9
4.2 Emergency Preparedness .....	9
4.3 Welfare .....	9
4.4 Communication & Training .....	9
5. Environmental.....	10
5.1 Environmental Permits and Reporting .....	10
5.2 Pollution Prevention and Resource Reduction.....	10
5.3 Hazardous Materials .....	10
5.4 Waste Management.....	10

5.5	Air Emissions.....	11
5.6	Packaging and Paper.....	11
5.7	Product Content Restrictions.....	11
5.8	Energy Consumption and Greenhouse Gas Emissions.....	11
6.	Business Ethics .....	11
6.1	Business Integrity .....	11
6.2	No Improper Advantage.....	11
6.3	Disclosure of Information .....	12
6.4	Conflict of Interest.....	12
6.5	Intellectual Property.....	12
6.6	Fair Business, Advertising and Competition .....	12
6.7	Information Protection and Data Privacy.....	12
6.8	Protection of Identity and non-retaliation .....	13
6.9	Responsible Sourcing of Material .....	13
6.10	Compliance .....	13
7.	Management System .....	13
7.1	Commitment to Continuous Improvement .....	13
7.2	Management Accountability and Responsibility.....	13
7.3	Legal and Customer Requirements.....	14
7.4	Improvement Objectives .....	14
7.5	Risk Assessment and Risk Management.....	14
7.6	Training and Communication.....	14
7.7	Worker Feedback and Participation .....	14

7.8 Documentation and Records ..... 14

7.9 Supplier’s Responsibility ..... 14

8. Governance ..... 15

9. Main References ..... 15

## 1. INTRODUCTION

Konica Minolta Business Solutions (UK) Limited (“Konica Minolta”) recognises that our supply chain activities can have wide ranging impacts and that our responsibility extends beyond our own operations and into those of our supply chain. We are committed to Socially Responsible Procurement (SRP) and have set high standards for the way we do business so our customers know we can be trusted.

In the event that UK or, where different local, law, regulation, rules or contract conditions impose stricter requirements than this Code, suppliers (and their supply chains) must comply with those requirements.

## 2. PURPOSE AND SCOPE

Our Supplier Code of Conduct (“Code”) sets out the minimum standards of behaviour we require of our suppliers. The Code is based on recognised international standards, principals and best practices and complies with the Electronic Industry Citizen Coalition (EICC) Code of Conduct. We ask our suppliers not just to comply with this Code, but to use all reasonable endeavours to exceed it and promote best practice and continual improvement throughout their business operations and they’re own supply chain.

The Code is applicable to all suppliers and suppliers are expected to cascade these requirements to their own supply chain.

In order to introduce Konica Minolta’s responsible procurement activities to stakeholders, and to promote high quality and transparency of CSR procurement, Konica Minolta Inc. joined Electronic Industry Citizenship Coalition (EICC) in October 2013.

## 3. PEOPLE

Suppliers shall be committed to uphold human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker.

All suppliers must comply with applicable international and national laws and standards (including Modern Slavery Act 2015) in relation to labour practices and human rights.

### 3.1 Voluntary Employment

Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour: slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force coercion, abduction or fraud for the purpose of labour or service. All work must be voluntary, and employees shall be free to terminate their employment in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.

### 3.2 Child Labour & Young Workers

- a) The minimum age for workers shall not be less than the age of completion of compulsory schooling and not less than 15 years or 14 where the local law of the country permits, deferring to the greatest age. However, the use of legitimate workplace apprenticeship programmes (which are to the benefit of the child) which comply with working laws and regulations is supported.
- b) Young workers, i.e. those under 18 years of age, shall not perform duties that are likely to be hazardous or to interfere with their education or that may be harmful to their health, physical, mental, social or moral development

### 3.3 Working Hours

We expect our suppliers to respect the rights and dignity of their workers and to comply with all applicable laws and regulations regarding working hours. Suppliers must ensure that their workers do not work more than the maximum hours permitted by local law, or, where no such law exists, the prevailing industry standards. Suppliers must also provide their workers with adequate rest periods and days off, and compensate them fairly for any overtime work. Suppliers must not use any form of forced, bonded, indentured, or involuntary prison labour.

### 3.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws workers shall be compensated for overtime at pay rates greater than regular hourly rates.

All workers should be provided with written and understandable information about their terms and conditions of employment, and in particular in respect of wages, before they enter employment, and about the particulars of their wages for the pay period concerned

each time that they are paid. Deductions shouldn't be made from wages as a disciplinary measure except; where permitted by law and upon express permission of the worker concerned. All disciplinary measures taken against Supplier Staff throughout the term of each contract should be recorded.

### **3.5 Humane Treatment**

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **3.6 Freedom of Association and Collective Bargaining**

Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers shall recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice. Suppliers must also respect any legal right of workers to bargain collectively.

### **3.7 Compliance with Modern Slavery Act 2015**

As part of the Modern Slavery Act 2015, commercial organisations with a UK presence and a global turnover of £36 million or above will be required to publish an annual statement of the steps it has taken for each financial year that ends on or after 31 March 2016. The statement must disclose what steps the organisation has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.

The Supplier warrants and represents that it has not been convicted, it is not currently under investigation, inquiry or enforcement proceedings in relation to any allegation of slavery or human trafficking offences anywhere around the world. The supplier shall make reasonable enquires to ensure that its officers, employees and Subcontractors have not been convicted of slavery or human trafficking offences anywhere around the world. The Supplier shall report the discovery or suspicion of any slavery or trafficking by it or its subcontractors to the authority and Modern Slavery Helpline.

Regardless of turnover or location, we expect our suppliers to prepare an annual statement which, dependent on each suppliers' own individual circumstances, covers all or part of the below and / or any other areas deemed relevant to that particular supplier:

- a) A brief description of the suppliers' business model and supply chain relationships;
- b) Policies relating to modern slavery, including due diligence and auditing processes implemented;
- c) Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- d) Training available and provided to those in (i) supply chain management and (ii) the rest of the suppliers organisation;
- e) The principal risks related to slavery and human trafficking including how the supplier evaluates and manages those risks in their organisation and their supply chain; and
- f) Relevant key performance indicators measuring the effectiveness of the activities on the anti-slavery and human trafficking statement.

If the supplier has a UK presence and global turnover of £36 million or above, the annual statement should have been approved internally by the senior management and published in accordance with the Modern Slavery Act 2015 requirements.

### 3.8 Anti-discrimination

Suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices such as promotions, rewards and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

### 3.9 Equality, Diversity and Inclusion

Suppliers shall promote a culture of enabling a supply chain that fosters and embraces equality, diversity and inclusion and actively support programmes that look to ensure a diverse worker base.

## 4. HEALTH AND SAFETY

A safe, healthy working environment enhances operational performance and increases morale and employee retention. We believe every employee has the right to work in a consulted safe healthy environment.



All suppliers must make proper provision for the health and safety of their employees and contractors and visitors and those in the community who may be impacted by their operations. Suppliers must comply with applicable international and national laws and standards in relation to health and safety management.

#### **4.1 Occupational Safety**

Suppliers are required to ensure worker exposure to potential health and safety hazards are controlled in line with the hierarchy of controls– Elimination, substitution, engineering controls, administration controls and finally personal protective equipment.

Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking or occupational injury or illness.

Procedures must encourage worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.

Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.

#### **4.2 Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimising harm to life, the environment and property.

#### **4.3 Welfare**

Suppliers shall keep their workplace inline with the role conducted at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites shall be clean, hygienic and have sanitary food, preparation, storage and eating facilities. There shall be clean drinking water, clean toilet and washing facilities.

#### **4.4 Communication & Training**

Suppliers shall provide workers with appropriate, reviewed and regular workplace health and safety related information and training, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs,

in the primary language of the workers, shall be displayed on relevant equipment and hazardous or toxic substances or objects.

## 5. ENVIRONMENTAL

We recognise that sustainable economic development is dependent upon environmental protection. All suppliers must comply with applicable international and national laws and standards in relation to environmental management.

### 5.1 Environmental Permits and Reporting

All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

### 5.2 Pollution Prevention and Resource Reduction

Suppliers are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.

### 5.3 Hazardous Materials

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

### 5.4 Waste Management

Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

Wastewater generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment systems.

### 5.5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.

### 5.6 Packaging and Paper

Supplier shall avoid undue and unnecessary use of material and use recycled materials whenever appropriate.

### 5.7 Product Content Restrictions

Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

### 5.8 Energy Consumption and Greenhouse Gas Emissions

Supplier should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

## 6. BUSINESS ETHICS

Konica Minolta expects the highest standards of ethical conduct in all of its endeavours. Suppliers shall always be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

### 6.1 Business Integrity

Konica Minolta promotes integrity and ethics in all aspects of its activities and does not tolerate any form of corruption, extortion or embezzlement. Suppliers must have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes) and must comply with the provisions of UK Bribery Act 2010. Suppliers must never make or approve an illegal payment to anyone under any circumstances.

### 6.2 No Improper Advantage

Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to Konica Minolta staff or representatives, either directly or indirectly through a third party,

in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

### **6.3 Disclosure of Information**

Suppliers shall disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance in accordance with the applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

### **6.4 Conflict of Interest**

Suppliers must make Konica Minolta aware of any actual or potential conflicts of interest that are relevant to Konica Minolta's business. For example, the Supplier shall declare if it believes one of Konica Minolta employees or contractors has an interest or economic tie to the supplier's organisation.

### **6.5 Intellectual Property**

Suppliers shall understand their role as custodians of customer information. Intellectual property rights must be respected, and all use of technology, information and know-how shall be conducted in a manner which does not endanger the intellectual property of Konica Minolta.

### **6.6 Fair Business, Advertising and Competition**

Supplier shall uphold standards of fair trading (in accordance with the meaning defined by World Fair Trade Organisation), advertising and competition. Means to safeguard customer information should be available.

### **6.7 Information Protection and Data Privacy**

Suppliers are committed to protecting the reasonable privacy expectations of personal information obtained from those they do business with, including suppliers, customers, consumers and employees. Suppliers must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers shall not use or disclose any information belonging to Konica Minolta, its existing and prospective customers, other suppliers, employees and other third parties,

except as required or authorised in writing by Konica Minolta. The supplier shall implement appropriate security controls to protect Konica Minolta's information.

### **6.8 Protection of Identity and non-retaliation**

Suppliers shall maintain programs that ensure the confidentiality and protection of supplier and employee whistle-blowing (if possible). Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

### **6.9 Responsible Sourcing of Material**

Suppliers shall exercise due diligence on the source of material and make their due diligence measures available to Konica Minolta request.

### **6.10 Compliance**

Suppliers must comply with all applicable local (and where applicable, EU) laws and regulations, both in letter and spirit, in all the countries in which they operate.

## **7. MANAGEMENT SYSTEM**

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code.

The management system should contain the following elements:

### **7.1 Commitment to Continuous Improvement**

A social and environmental responsibility policy statements affirming the Supplier's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

### **7.2 Management Accountability and Responsibility**

Suppliers shall be clearly identify their representative[s] responsible for ensuring implementation of the management systems and associated programs. The identified person shall actively transparently and collaboratively communicate with Konica Minolta's representative.

### **7.3 Legal and Customer Requirements**

Suppliers shall identify, monitor and understand applicable laws, regulations and customer requirements regarding corporate responsibility. Adequate documentation and records to evidence regulatory compliance and license to operate shall be in place.

### **7.4 Improvement Objectives**

Suppliers shall develop written performance objectives, targets and implementation plans to improve their social and environmental performance including a periodic assessment of Suppliers performance in achieving those objectives.

### **7.5 Risk Assessment and Risk Management**

Suppliers shall develop and implement processes to identify the privacy, environmental, health and safety and labour practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and regulatory requirements.

### **7.6 Training and Communication**

There shall be programmes for communication with and training of managers and workers regarding policies, procedures and improvement objectives designed to meet applicable legal, regulatory and client requirements.

### **7.7 Worker Feedback and Participation**

Suppliers shall set in place an anonymous feedback mechanism. Programs shall be in place to ensure the protection of confidentiality and obstruction of retaliation regarding whistle blowing made in good faith.

### **7.8 Documentation and Records**

Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

### **7.9 Supplier's Responsibility**

As a supplier of Konica Minolta, the supplier's role begins, but does not end, with understanding the Code. Suppliers should develop process to communicate the Code requirements to its own suppliers and to monitor those suppliers compliance to the Code.

If any ethical or legal compliance issues arise that raise any questions, the suppliers have the responsibility to bring them forward.

## 8. GOVERNANCE

Konica Minolta may verify the compliance of all its direct suppliers with the Code. Such verification will be conducted by way of a supplier's self-evaluation or an audit by Konica Minolta (or an external resource designated by Konica Minolta) who may visit the supplier's facilities with appropriate notice.

Compliance with the principles contained in the Code is a criteria that may be taken into consideration in Konica Minolta's supplier selection process.

Whenever a situation of non-compliance is identified or supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the relevant representative of Konica Minolta. Konica Minolta may work with the supplier to develop and implement a corrective action plan to improve the situation. Konica Minolta will continue to develop monitoring systems to assess and ensure compliance with the code.

To raise a concern, the supplier can send an email to: [compliance@konicaminolta.co.uk](mailto:compliance@konicaminolta.co.uk)

Konica Minolta will ensure that all raised compliance issues in the Code are resolved quickly, fairly and at the proper level in the Company.

## 9. MAIN REFERENCES

Universal Declaration of Human Rights

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

ILO International Labour Standards

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.html](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.html)

ISO14001:2004

[www.iso.org](http://www.iso.org)

ISO45001:2018

[www.iso.org](http://www.iso.org)

SA 8000:2014

<http://www.sa-intl.org/>

OECD Guidelines for Multinational Enterprises

[www.oecd.org](http://www.oecd.org)

United Nations Convention against Corruption

<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

Electronic Industry Citizenship Coalition

<http://www.eiccoalition.org/standards/code-of-conduct/>

UK Data Protection Act

<https://www.gov.uk/government/collections/data-protection-act-2018>

European General Data Protection Regulation

<https://www.gov.uk/government/collections/data-protection-act-2018>