



KONICA MINOLTA

Konica Minolta Business Solutions UK Ltd.

Whistleblowing Policy

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Preamble

KONICA MINOLTA is the top provider in the field of office and industrial printing solutions and IT related services. We continually take new approaches in order to offer our customers intelligent and tailor-made solutions – always with the goal of creating long-term value. We know that it is not only important to achieve business objectives, but also how we achieve them. Through our products and services, we have earned the trust and respect of our business and sales partners. Our customers, business partners, the general public and our employees expect that we conduct ourselves with reliability at all times in our business relationships, as punishable legal violations can pose considerable and, in some cases, even existential risks to both Konica Minolta and all our stakeholders. These risks range from damage to the company's reputation to disciplinary and even criminal consequences.

As a matter of course, we obey the provisions of law and our internal rules and regulations. Our Charter of Corporate Behavior as well as our local Codices of Conduct are central KONICA MINOLTA documents. The most important information and rules that apply to the management and to all employees are compiled in these documents. Directives, Guidelines and Policies provide detailed and concrete assistance regarding how we are supposed to behave in important areas of business life in the day-to-day operations.

This Whistleblowing Policy regulates the handling of whistleblowing reports, administrative processes in this regard, guarantees the anonymity of the whistleblower and, last but not least, guarantees whistleblowers protection against reprisals.

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POLICY STATEMENT

We seek to conduct our business honestly and with integrity at all times and accordingly we promote a culture of openness and accountability. However, we acknowledge that all businesses face the risk of things going wrong from time to time, or that concealed malpractice, illegal or unethical conduct may be taking place. Any suspected wrongdoing should be reported as soon as possible.

This policy applies to employees, officers, agency workers, casual workers, consultants and self-employed contractors.

This policy does not form part of your contract of employment, and we may amend it at any time. We will review the policy from time to time to ensure that it continues to reflect our legal obligations and the Company's organizational and business needs.

RESPONSIBILITIES

Everyone has a role to play in ensuring the success of this policy. This policy should be followed to report any suspected danger or wrongdoing as soon as possible. All leaders must set an appropriate standard and must proactively promote awareness of this policy and ensure that concerns are taken seriously.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information relating to genuinely suspected misconduct or wrongdoing. For instance:

- Criminal activities
- Bribery or corruption
- Violation of accounting obligations, irregularities or fraud
- Improper behavior or unethical behavior
- Danger to health and safety
- Behavior that could harm the reputation of KONICA MINOLTA
- Infringements of competition law or anti-competitive practices
- Environmental violations
- Non-compliance with legal obligations or regulatory requirements
- Unauthorised disclosure of confidential information
- Violations of quality standards or regulatory requirements
- Violations of our internal policies and procedures
- The attempt to hide any of the above
- Deliberately concealing any of the above issues.

A whistleblower is an employee who, in good faith, identifies and reports serious concerns about misconduct or dangers at work. If anyone has any serious concerns about suspected misconduct or obvious misconduct affecting any of our activities, this should be reported with respect to Whistleblowing Policy.

This policy is not intended to be used for complaints or concerns relating to your own personal circumstances. Please raise such matters under the Grievance Policy.

REPORTING OF POSSIBLE MISCONDUCT

We hope that in most cases employees will be able to report possible misconduct to their leader verbally or in writing. They may be able to agree a way of resolving the raised concern quickly and effectively. If you prefer not to raise with your leader for any reason you should report your concern to Internal Audit department using one of the below method:

[Email: SpeakUp@Konicaminolta.co.uk](mailto:SpeakUp@Konicaminolta.co.uk)

If you believe that you cannot or do not want to address the concerns of possible misconduct directly with your Leader, or Internal Audit team you should use the independent and secure reporting channels of our service provider NAVEX Global Inc. (NAVEX).

NAVEX is designed to be all-encompassing, extending its reach to cover not only our internal operations but also business partners, third parties, and anyone associated with our organization, fostering a culture of transparency and accountability.

NAVEX provides an independent external reporting line where you can report concerns about potential misconduct by KONICA MINOLTA employees. When contacting NAVEX by freephone telephone, you will be asked by a professional call handler to explain your concern in as much detail as possible. During this time, he or she will take notes and may ask you questions based on the account you give. Once the call is completed, NAVEX will send a written notice of this report via a secure platform to BEU Corporate Governance Management – Compliance & Sustainability – who will at all times respect the confidentiality of the disclosure.

NAVEX confidential reporting service is available 24/7 (0808-234-8540) and is staffed by highly skilled professional call handlers. You will be asked if you wish to remain anonymous and your concern will then be shared with a team of individuals from Konica Minolta Europe's (BEU) Compliance Team for investigation.

Alternatively, you can use the online form provided on the NAVEX website, <http://konicaminolta.ethicspoint.com> to file a new report. NAVEX strives to make reporting issues and concerns via EthicsPoint™ as direct and uncomplicated as possible. Whistleblowers should follow the instructions given on the web page, which will guide them through the process. This system grants confidentiality and anonymity at each step.

NAVEX will NOT share your name with KONICA MINOLTA if you wish to remain anonymous. In addition, NAVEX does not audio record any of the calls to help protect the identity of anonymous callers.

ANONYMITY

We hope that all KONICA MINOLTA employees share our thoughts on transparency in order to disclose information relating to suspected misconduct.

If you wish to stay anonymous, NAVEX will endeavor to keep your identity confidential. If it is necessary for someone who investigates your report, to know your identity, NAVEX will discuss this with you first.

You can submit your report about possible misconduct anonymously. Nevertheless, KONICA MINOLTA encourages you to do so openly. A proper investigation can be difficult or even impossible if BEU Corporate Governance Division –Compliance– cannot gather more information from the whistleblower. It is also more difficult to determine whether the report is credible. Whistleblowers, who are concerned about possible reprisals if their identity is disclosed, are hereby assured that KONICA MINOLTA will not tolerate any form of reprisal or other disadvantageous treatment of KONICA MINOLTA employees expressing concerns in good faith.

REPORTING OF POSSIBLE MISCONDUCT OF OTHER PARTIES

The aim of this Whistleblowing Policy is to provide an internal mechanism for reporting, investigating and eliminating workplace misconduct. The reporting of misconduct usually refers to the behavior of KONICA MINOLTA employees. However, sometimes it might refer to the behavior of another party. If this is the case, please report the possible misconduct to your Leader directly, your Executive Board member and Internal Audit Manager verbally or in writing. In addition, please contact BEU Corporate Governance Management – Compliance & Sustainability – for any reports regarding possible rule violations.

EXTERNAL DISCLOSURES

We encourage you to use this policy whenever you have a whistleblowing concern, we have an internal mechanism for reporting, investigating and remedying any wrongdoing or dangers in the workplace. In most cases it should not be necessary to disclose your concerns externally.

We recognize that in some circumstances it may be appropriate for you to report concerns to an external body, such as a regulator. It will very rarely be appropriate to alert the media. You are strongly encouraged to seek advice before reporting a concern to anyone external.

INVESTIGATION PROCESS AND OUTCOMES

Once the whistleblower has reported their concerns, may it be via freephone telephone or via online report, it is sent to BGB Internal Audit Team only. BGB Internal Audit team will confirm receipt of the report within seven (7) days. The exchange of information between Internal Audit team and the whistleblower is ensured by using the secure platform.

Internal Audit team examines the possible misconduct/violations, responds appropriately and will inform the accused person about the accusations made. In certain cases, however, providing the accused person with comprehensive information at an early stage can have a negative impact on the investigation and may even jeopardize the success of the investigation. In such cases, the provision of information to the person concerned may be withheld.

The whistleblower will be informed about further steps and the expected timetable in due course. It may be necessary for the whistleblower to participate in further meetings in order to substantiate the information provided.

The whistleblower will be informed within three (3) months of the measures taken, the status of the internal investigation and its result.

The whistleblower should treat all information about the further course of action confidentially. It should be made clear to the Internal Audit department if the whistleblower does not wish to receive direct feedback on following actions.

There will be significant consequences for the submission of knowingly false or misleading information. The dissemination of false information –where the discloser knew that such dissemination was false– is a criminal offence in many countries. However, reports made in good faith and to the whistleblowers' best knowledge will not result in any negative action by KONICA MINOLTA.

SAFEGUARDING AND SUPPORT TO WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes concerned about possible negative repercussions. KONICA MINOLTA promotes openness and supports employees who express genuine concerns even if it turns out they are wrong.

Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine whistleblowing concern. If you consider that you are being subjected to detrimental treatment

you should inform the HR Operations team. If the matter is not remedied, you should raise it formally under the Grievance Policy.

We do not tolerate retaliation against those who raise genuine whistleblowing concerns. Any individual who threatens or retaliates against a whistleblower in any way will be subject to disciplinary action under the Disciplinary Policy.

If a whistleblower has reason to believe to be subject to any such negative repercussions, please notify Internal Audit team directly or contact NAVEX. Knowingly false or misleading information will result in serious consequences to whistleblowers.

GDPR CONFORMITY

All personal data, both that of the whistleblower and any accused persons, will be processed in accordance with GDPR.

OTHER APPLICABLE DOCUMENTS

Code of Conduct

Charter of Corporate Behavior

Record of Revision

REVISION NO.	REVISION DATE	DESCRIPTION OF CHANGE	SECTION
3	05.03.2024	General Review and Update	All