



KONICA MINOLTA

1.0 Introduction

Konica Minolta Business Solutions Australia Pty Ltd (“Konica Minolta”) is committed to the highest levels of integrity and ethical standards in all its business practices. As a demonstration of Konica Minolta’s commitment to these standards and to address the significant risks associated with unacceptable conduct, Konica Minolta has established a Whistleblower Policy. The purpose of this policy is to:

- encourage the reporting of illegal, fraudulent or corrupt behaviour;
- enable Konica Minolta to effectively deal with reports from whistleblowers; and
- protect whistleblowers against reprisals.

2.0 What is whistleblowing?

Whistleblowing describes making a **protected disclosure** to alert eligible recipients to corporate crimes or unethical behaviour occurring within a company. A **protected disclosure** is a disclosure or report made by an eligible whistleblower regarding a relevant wrongdoing or wrongful state of affairs within a company. An eligible whistleblower who makes a protected disclosure cannot suffer reprisals or detriment for their disclosure and have protections available to them.

3.0 Who can be a whistleblower?

Eligible whistleblowers include, but are not limited to:

- Current or former employees, directors, officers, senior managers or contractors of Konica Minolta or subsidiaries;
- A person who supplies (or supplied) goods or services to, or has (or had) a transaction with, Konica Minolta.
- An employee of a person who supplies (or supplied) goods or services to, or has (or had) a transaction with, Konica Minolta.
- An associate of Konica Minolta
- A relative, spouse or dependant of any of the individuals listed above
- A lawyer on behalf of a discloser in one of the above categories.

4.0 What conduct is covered by this policy?

Whistleblowers are encouraged to report all instances of unacceptable conduct. When a report is made by an eligible whistleblower to an **eligible recipient** about a company, this is called a **protected disclosure**. Unacceptable conduct includes but is not limited to:



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- corruption, fraud or other illegal activity
- gross mismanagement or waste of company resources or other actions that cause, or have the potential to cause, financial loss to Konica Minolta
- misconduct or an improper state of affairs
- a serious breach of company policies or procedures, action that may cause damage to its reputation or otherwise be detrimental to Konica Minolta's interests
- unsafe behaviour that places the safety and health of employees, customers, suppliers or the public at risk
- actions that may damage the environment
- bullying and harassment
- other unethical conduct or conduct which puts Konica Minolta's reputation at risk
- modern slavery concerns within Konica Minolta's supply chain

5.0 Who can be reported to?

Eligible recipients can be:

- an immediate manager
- An auditor, or member of a team conducting an audit of Konica Minolta
- a Compliance and Risk Manager of Konica Minolta
- a member of the Legal team of Konica Minolta
- the whistleblower hotline (see Section 6.0)
- Konica Minolta, Inc (see Section 8)

A whistleblower that is aware of any unacceptable conduct or serious wrongdoing is encouraged to report to an eligible recipient immediately. Individuals must not attempt to conduct investigations personally. Investigations can only be performed by those with the authority to do so under this policy.

6.0 Anonymous reporting: special whistleblower hotline

While it is preferable to raise concerns about unacceptable conduct or serious wrongdoing in the manner described above, Konica Minolta recognises that an individual may not always feel comfortable coming forward to representatives of Konica Minolta. Accordingly, Konica Minolta has engaged a fully independent reporting service. Details of the current and past service providers set out below. Reports to the reporting service may be made on a strictly anonymous basis.

Policy Whistleblower Policy

Owner Legal and Compliance

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For individuals who avail themselves of this service and do not wish to remain anonymous, every effort will be made to keep the report confidential, subject to the need to conduct an adequate investigation. All documents, reports and records relating to the investigation of a whistleblower hotline report will be confidentially stored and retained in an appropriate and secure manner.

| Hotline Provider |
|--|
| Stopline Australia Telephone: 1300 30 45 50 Website: konicaminolta.stoplinereport.com Email: konicaminolta@stopline.com.au |

7.0 Dealings with Whistleblowers

8.1 Anonymity

If requested, the whistleblower's identity won't be revealed unless:

- they explicitly consent
- compelled by law
- it is necessary to prevent or mitigate a serious threat to the health or safety of an individual or individuals
- it is necessary to protect or enforce Konica Minolta's legal rights or mount a defence to claims
- it is necessary to fairly investigate the issues raised with the respondent concerned.

8.2 Protection

Any whistleblower who reports in good faith and who has not been involved in the reported misconduct will not be personally disadvantaged by their choice to report. A whistleblower does not need to identify themselves to qualify for protection. Konica Minolta will do its utmost to protect against instances of whistleblowers being:

- Retaliated against
- Harassed or persecuted
- Discriminated against
- Dismissed or demoted

Any whistleblower who believes that they have not been adequately protected should immediately contact the Chief People and Culture Officer.

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8.0 Escalation to Konica Minolta, Inc.

If a person believes that the whistleblowing system set out above may not be effective (for example, if a person in charge of the whistleblowing system is a director), that person may escalate the report to Konica Minolta's Japanese parent as follows:

| Hotline Provider |
|--|
| Email: helpline@konicaminolta.jp Responsible Person: Executive officer for Group Compliance (may be assigned to his/her colleague) |

Konica Minolta, Inc has placed compliance as a top priority and is firmly committed to strengthening Konica Minolta Group's compliance through many avenues. Improving compliance strengthens corporate governance, and assists Konica Minolta Group to achieve sustainable growth for the future. As whistleblowing is one of the most effective ways to improve compliance, the Executive officer for Group Compliance may be contacted by any eligible whistleblower to report any instances of illegal, unethical, fraudulent or otherwise non-compliant behaviour.

Konica Minolta, Inc guarantees that a fact alleged by a whistleblower will be treated as strictly confidential and no whistleblower will be unjustly treated unless allegations are made with malicious or harmful intent.

9.0 Investigation

Reports involving unacceptable behaviour and serious wrongdoing are a major concern and all cases will be investigated, unless there is insufficient information to investigate or there appears to be no genuine basis for the allegation. Investigations will not be disclosed or discussed with anyone other than those who have a legitimate need to know.

The Compliance and Risk Manager is responsible for the investigation of unacceptable behaviour, to the extent this is practicable, and the report does not involve the particular individual. Depending on the size and nature of the report, there are escalation requirements. The table below outlines the escalation requirements upon receiving a report of unacceptable behaviour.

Investigations will be conducted without regard to the individual's length of service, position/title, or relationship with Konica Minolta. Any individual who is under investigation for unacceptable behaviour may be suspended, pending the outcome of the investigation.



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| Size and nature of report | Escalation |
|--|---|
| Any report of unacceptable behaviour received by management or via the confidential Stopline | The Compliance and Risk Manager (to the extent it does not involve that individual). If it does, then the investigation will be undertaken by legal. |
| Where the unacceptable behaviour meets the definition of illegal conduct or corruption (regardless of financial impact) | The Compliance and Risk Manager will escalate to The Group Financial Controller, The Managing Director and legal. |
| Where the unacceptable behaviour is fraudulent in nature and the financial impact is greater than \$20k | <p>The Compliance and Risk Manager will prepare an immediate report for the Group Financial Controller, The Managing Director and legal.</p> <p>The Compliance and Risk Manager and legal will discuss the matter, including and legal action with the Group Financial Controller, and The Managing Director.</p> |
| Where the unacceptable behaviour is fraudulent in nature and has a financial impact of less than \$20k and the matter can be immediately contained | The Compliance and Risk Manager will ensure the event is reported in the compliance meetings to senior management. |

10.0 Protection

Konica Minolta **will not** tolerate any form of harassment or retaliation against those who make reports of unacceptable behaviour in good faith. Any such retaliatory action may be treated as serious misconduct and will be the subject of disciplinary action, which may include termination.