

Canon Europa NV, Canon Europe Ltd, and Canon (UK) Ltd Modern Slavery Act Statement for Year Ended the 31st of December 2024.

Canon Europa NV, located in Amstelveen (The Netherlands), Canon Europe Ltd, located in Uxbridge (UK) (together referred to as Canon Europe), and Canon (UK) Ltd (Canon UK), situated in Uxbridge (UK), make this statement pursuant to the United Kingdom Modern Slavery Act 2015. This statement aims to provide transparency on our policies and due diligence strategy to prevent the occurrence of modern slavery in our operations and supply chains for the fiscal year-end on the 31st of December 2024.

Our Business

Canon Inc. is a Japanese corporation established in 1937 and headquartered in Tokyo, Japan. Canon Inc. is the parent company of the Canon Group. The Group includes 334 consolidated subsidiaries and is structured around four industry-oriented business units: Printing, Imaging, Medical and Industrial. The Canon Group develops, manufactures, and sells office multifunction devices (MFDs), laser printers, inkjet printers, cameras, medical equipment, lithography equipment, and many other products.

Canon Europe is a subsidiary of Canon Inc. Canon Europe is one of Canon's regional headquarters looking after its strategy creation, marketing, service and support for its markets in Europe, the Middle East, and Africa (EMEA region).

Canon UK is a UK marketing and sales operation subsidiary of Canon Europa NV. On the 31st of December 2024, Canon UK employed 1,262 people in various locations, including the head office in Uxbridge and offices in London, Elstree, and Birmingham.

As of 31st December 2024, Canon Inc.'s global consolidated net sales were 4,509 billion yen and the Canon Group had approximately 170,340 employees. In Europe, Canon totalled sales of 1,184 billion yen and had a workforce of approximately 22,569 employees over the same period. Further details about Canon Inc. corporate activities can be found on the official Canon global website ([Canon Global](#)).

Supply Chain

Canon Inc. places great importance on manufacturing, engaging in product assembly as well as the production of certain components, parts and materials at its own plants, factories and Canon Group manufacturing companies that bear the Canon name and are owned by Canon Inc. directly or indirectly.

Canon production sites located in Japan, China, Taiwan, Malaysia, Thailand, the Philippines, Vietnam, the United States, and Europe are responsible for supplying Canon products to Canon Inc. as well as Group marketing subsidiaries and affiliates. As the head of the Canon Group, Canon Inc. supervises Canon production sites that directly employ large numbers of people. Canon production sites also have partnerships with suppliers worldwide unaffiliated with the Canon Group, from whom they purchase considerable numbers of components, such as electronic parts, mechanical parts, units, and materials.

Further information on Canon's subsidiaries and affiliates, their locations, employee numbers and activities, is available in the [Canon Group Directory | Canon Global](#) on the Canon Inc. global website.

Canon Europe and Canon UK Supply Chain: By far our largest supplier of products and services is Canon Inc. from whom we purchase imaging products, components, and consumables such as toner and ink for resale. In Europe and the United Kingdom, we primarily source printing paper, packaging, and a relatively small number of non-Canon commercial products from regional suppliers. We also source various services from suppliers across the EMEA region and beyond, including warehousing and distribution, real estate and facility management, ICT, marketing and communication, finance, travel, etc.

Our Policies and Code of Conduct

Canon believes that respect for human rights is fundamental to our business and corporate management. Canon's corporate philosophy is *kyosei*, which means "living and working together for the common good." *Kyosei* philosophy conveys our dedication to seeing all people, regardless of culture, customs, language or race, harmoniously living and working together in happiness into the future.

Further details provided on [Corporate Philosophy & Spirit | Canon Global](#)

Canon Group Human Rights Policy

The Canon Group Human Rights Policy, established in 2021, expresses Canon's commitment to respect human rights and take measures to protect human rights under the corporate philosophy *Kyosei*, which we embed in our operational policies and procedures.

This policy specifies that the Canon Group commits to respect internationally recognized human rights across its business activities, as set out in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, United Nations' Guiding Principles on Business and Human Rights, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

It stipulates that Canon will conduct human rights due diligence, establish and operate a grievance mechanism, conduct awareness training, and engage in dialogue with stakeholders in addition to respecting internationally recognized human rights, including the prevention of child labour, forced labour, unreasonable restrictions on movement and excessive overtime work, and also the respect for freedom of association and the right to collective bargaining.

The Human Rights Policy is available via the Canon website: [Canon Group Human Rights Policy](#) and is communicated to employees and stakeholders in various countries and regions worldwide.

In conjunction with the establishment of the Canon Group Human Rights Policy, since 2021, we have implemented a human rights awareness training programme for employees to ensure they understand the importance of human rights in all our business activities and the initiatives we have in place. In 2023 this programme was expanded to Group companies reflecting national and local characteristics, and each company has optimised the content and translated it into each language.

Canon Group Code of Conduct

The Canon Group Code of Conduct, established in 2001, sets the standards to which executives and employees of the Canon Group are required to conduct their duties. Based on the Code of Conduct, the Group has formulated a range of policies, covering matters such as human rights, labour, the environment, legal compliance, procurement, and security, to govern its business activities.

In 2024, we introduced the EMEA Code of Conduct, which is specifically tailored for our operations across the EMEA region. While aligned with the principles and values of the Canon Group Code of Conduct, the EMEA Code reflects regional considerations and provides additional guidance relevant to our local business practices.

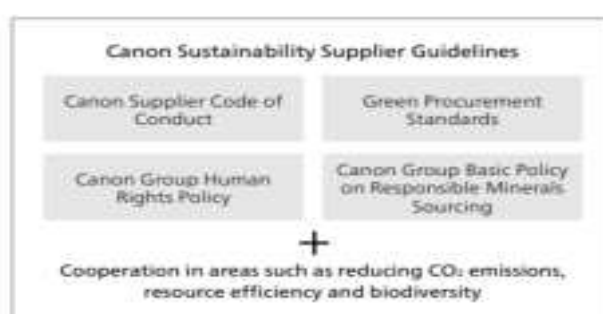
The [Canon Supplier Code of Conduct](#), reviewed and updated in 2024, is formulated based on the Responsible Business Alliance (RBA) Code of Conduct, to promote procurement activities that take proper account of labour, health and safety, environmental concerns, and management systems. This document acts as the basis for fulfilling social responsibilities in the supply chain.

Canon Europe and Canon UK introduced a Supplier Code of Conduct in 2013 which applies to all suppliers. It is embedded in [General Purchase Terms and Conditions](#) and procurement contracts. We expect all our suppliers to operate according to this Code and follow the principles contained within the International Bill of Human Rights principles, the Covenants of the ILO, and other relevant international treaties and covenants. This Supplier Code of Conduct requires suppliers to "ensure not

to use or facilitate any forced or compulsory labour, including debt bondage, trafficking, and other forms of modern slavery.

Our Procurement Policy

Canon's Procurement Policy establishes our basic stance on procurement, with the emphasis placed on observing corporate ethics, environmental conservation, and fair and equitable business conduct. We are working to develop a socially responsible global supply chain on issues such as labour, occupational health and safety, the environment, corporate ethics and management systems. In July 2024, we also formulated and distributed to suppliers the Canon Sustainability Supplier Guidelines, which summarize our initiatives for addressing climate change, human rights, and other important issues related to sustainability; requests for supplier cooperation and surveys; and the standards set out in the Canon Supplier Code of Conduct and Green Supply Chain Management Procurement Standards. Based on these guidelines, we will continue to strengthen sustainable procurement in our supply chain. Our [Procurement Policy](#) and the [Canon Sustainability Supplier Guidelines](#) are published on our website to inform all stakeholders.



Canon Group Whistle-blower Policy

Canon Europe and Canon UK have local grievance mechanisms in place for employees (permanent and temporary workers as well as contractors) to raise their concerns on any conduct or compliance issue, including modern slavery. We ensure that there is protection and processes to ensure non-retaliation in place for employees who make disclosures. We reviewed our local whistle-blower policy in 2021 and rebranded it as the "Speak Up Policy". We also updated our modern slavery training to include our updated grievance mechanism, with both going live in January 2022. In 2024, no modern slavery-related grievances were raised via the Speak Up Policy.

The wider Canon Group has established whistle-blowing routes through which employees can report specific human rights concerns in their own language. Canon Inc. also works to raise awareness of the reporting system via the company intranet and training programmes. The [Responsible Business Conduct Hotline](#) is a point of contact on the Canon Global website for external stakeholders to report specific human rights concerns about Canon's corporate activities. Both internal and external contact points maintain the privacy of informants and allow people to report anonymously to ensure that they do not suffer unfair treatment as a result. The facts in any whistle-blowing case are investigated through the entity they are received through. If Canon judges that there is a problem with appropriate steps and procedures, the company works to remedy the problem and prevent any recurrence.

In 2024, Canon globally received 140 cases concerning human rights-related issues (discrimination/harassment, wages, working hours). This number is not limited to the Canon Global online portal (link above), it is a combined figure from all available routes for raising concerns. Out of these 140 cases, Canon completed investigations required remedying in 27 cases. For cases that required remedying, we issued warnings or guidance to the employees at fault or relevant departments, as well as disciplinary action or transfers to prevent recurrence.

Industry Coalition

Responsible Business Alliance

In December 2019, Canon Inc. joined the Responsible Business Alliance (RBA), a coalition of companies that promotes socially responsible global supply chains. Canon actively promotes initiatives that consider the global environment, people, and society by respecting the RBA's vision and mission and adopting its Code of Conduct.

- Vision: A global electronics industry that creates sustainable value for workers, the environment, and business.
- Mission: Members, suppliers, and stakeholders collaborate to improve working and environmental conditions through leading standards and practices.

The Canon Group conducts self-inspections using RBA's Self-Assessment Questionnaire at its domestic and overseas production sites to assess the risk of human rights violations. In 2024, 64 Canon Group production sites worldwide were assessed and confirm that the sites are not making use of child or forced labour or are respecting workers' freedom of association and right to collective bargaining. In addition, the Canon group conducts internal audits, including on-site inspections, and undergoes regular external audits.

In 2024, 22 sites worldwide underwent Validated Assessment Program (VAP) audits by the RBA, and we are taking corrective actions to address findings as follows:

- Management of working hours and wages of workers, including on-site service providers, and employee cost burden.
- Maintenance of emergency exits, evacuation routes, and disaster prevention equipment.
- Expansion of languages to clearly indicate evacuation route maps, evacuation signs and health and safety information.
- First aid kit management, signs directing use of protective equipment.

The Canon Group is committed to making further improvements within the supply chain through implementation of the RBA Code of Conduct and utilising a range of RBA training and assessment tools.

Responsible Mineral Initiative

Since April 2015, Canon has supported the Responsible Mineral Initiative (RMI) activities, and an international programme focused on addressing the issue of conflict minerals.

UN Global Compact

Canon Europe has been an annual signatory to the UN Global Compact since January 2014, thereby fully supporting the Compact's ten principles, including eliminating all forms of forced and compulsory labour (Principle 4). Canon Europe is committed to ensuring that the principles are consistently followed across our business operations and supply chains. For more details and access to our "Communication on Progress" (CoP) report, please visit <https://www.unglobalcompact.org/what-is-gc/participants/30671>.

Supply chain risks and due diligence

Before starting business dealings with a new supplier, the Canon Group conducts an assessment based on the Canon Sustainability Supplier Guidelines and other reference standards of whether the company fulfils all requisite standards in terms of corporate ethics, environmental conservation (chemical substance management, prevention of air pollution and water pollution, proper disposal of waste, initiatives aimed at conserving energy and resources, reduction of GHG, and biodiversity conservation), finance, and production structure. Only those suppliers who meet these criteria are accepted as suppliers.

We aim to preferentially deal with suppliers evaluated highly in our comprehensive assessment including our annual supplier survey as well as each supplier's trade performance. In addition, we conduct on-site audits of suppliers with low evaluations, providing guidance and instruction for

improvement. In particular, the Canon Group may choose to terminate business with suppliers if they are not complying with laws and social norms covering areas such as human rights, labour, and the environment.



The Canon Group also requests major suppliers to sign an agreement confirming adherence to the RBA Code of Conduct. In 2024, agreements were signed with 371 of 378 major suppliers, equating to a consent rate of 98.1%. We also request the second-tier suppliers to understand and adhere to Canon Supplier Code of Conduct through the first-tier suppliers.

For parts and materials suppliers of its main business products ("major suppliers"), the Canon Group uses an RBA approved Self-Assessment Questionnaire (SAQ) to identify their labour, health and safety, environmental, and ethical risks. Our 2024 survey of 378 companies elicited responses from 372 companies (representing 98.4%). Suppliers that did not reply to the survey were followed up individually. No businesses were identified as high risk among these suppliers, but we provided feedback on the results to our major suppliers and requested that they identify weaknesses and improve on them.

We also conduct online meetings and arrange site visits to help verify the SAQ responses of a select number of major suppliers around the world. During on-site inspections, we check that suppliers have instituted proper policies and internal regulations relating to labour, health and safety, the environment, ethics and supplier management, and that the systems for formulating and managing annual plans for environmental performance targets are functioning effectively. Recognizing the need to reinforce systems for compliance with the RBA Code of Conduct, we also confirm that suppliers and the Canon Group should be committed to working together to achieve continuous improvements.

Based on the survey responses, we confirm that there is no evidence of child or forced labour or any unreasonable restrictions on workers' movements on the site or while at work. In addition, to mitigate the risk of forced labour, we have confirmed through the SAQ that Group companies do not retain originals of employee personal ID documents or other personal documents, and that they have put regulations in place that clearly stipulate this.

Since 2022, at our core business production sites we have also been carrying out risk assessments relating to labour, health and safety, the environment, and ethics, for the major onsite service providers related to security, cleaning, and cafeteria, labour agencies, and facility or dormitory

management companies. The assessments conducted in 2024 identified risks mainly in the following areas, and we worked for improvement in collaboration with suppliers.

- Charge for expenses incurred for employment

In line with a company rule, employees were being charged for essential work items such as uniforms and tools. After requesting that charges be refunded and the company regulations revised, we checked that the rule had been changed.

- Prohibition on punitive fines

Disciplinary regulations included fines and pay cuts. Since these are not permitted under RBA standards, we requested that the company revise its regulations. Later, we checked that the rules had been revised.

- Appropriate pay slips

Since short-term workers were not receiving details of their paid hours or rates, we advised the company to provide them more detailed wage statement.

- Physically demanding work

We requested a review of the work standards to ensure that tasks requiring the transportation of heavy objects (over 50 pounds) are carried out by two or more people. Additionally, we confirmed that pregnant women are not assigned tasks involving heavy objects.

- Management of personal information

With a supplier where the access to personal information about employees was not restricted properly, we requested that a framework of appropriate access controls be created. Later, we checked that a system involving password-setting had been established.

More details on Canon's supply chain management can be found on: [Supply Chain Management | Canon Global](#).

Entire Canon Group

At Canon, the Chief Financial Officer (CFO) holds the responsibility as the executive of human rights, while the sustainability, legal, and human resources divisions of Canon Inc. serve as the secretariat, pursuing human rights initiatives. The secretariat formulates an overall plan for human rights initiatives, establishes and operates grievance mechanisms, conducts stakeholder engagement, and reports important matters to the executive in charge. Potential human rights violation risks have been identified as a significant risk by the Risk Management Committee established by a resolution of the Board of Directors. Each Canon Inc. division and Group company is implementing initiatives to prevent and mitigate human rights risks. The results are evaluated annually by the Risk Management Committee and reported to the CEO and Board of Directors. We also established a Human Rights Working Group in April 2024 under direction of the Sustainability Committee, which engages in activities aimed at ensuring appropriate human rights disclosure.

Based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, we undertake human rights due diligence across the Group. Each Canon Inc. division and Group company conducts human rights due diligence in their respective business activities, including the supply chain. RBA's human rights country/region risk index has been used as the basis of the risk assessment program.

We have identified 11 items as salient human rights risks that may arise in the Canon's business activities, including the supply chain. These include discrimination based on factors such as race, gender, or religion; harassment; child labour; forced labour; unpaid wages/low wages; excessive overtime work; occupational health and safety; and protection of privacy. As shown in the table below, various measures are taken to prevent and mitigate these risks.

	Rights holders				Measures
	Suppliers/ Contractors	Canon employees	Customers/ Consumers	Local communities	
Discrimination based on such factors as race, gender, or religion		●			Thoroughly disseminate Canon Group Code of Conduct with company.
Harassment		●			Raise awareness through training and meetings to prevent harassment
Child labor	●				Engagement through supplier questionnaires
Forced labor	●				
Unpaid wages/low wages	●				
	●				
Excessive overtime work		●			Implement so-called "no overtime days" (twice a week), educate managers on how to thoroughly manage subordinates' working hours in training sessions, and set alerts for employees who may exceed overtime limits
	●				Engagement through supplier questionnaires
Occupational health and safety		●			Formulate a health management strategy map to further promote health management and prevent the occurrence of occupational accidents
		●			Monitor trends regarding tighter personal data protection regulations in various countries and regions, and ensure compliance with rules for handling cookie data
Protection of privacy			●		Create and ensure compliance with rules and guidelines for information dissemination through advertising, public relations, websites, and social media
Procurement of conflict minerals				●	Identify conflict-torn regions and high-risk areas and avoid the use of materials supplied by businesses with high human rights and environmental risks
Noise, environmental pollution at operational sites				●	In all aspects of corporate activities, comply with applicable national and regional laws and agreements with other stakeholders, while promoting energy and resource conservation and the elimination of hazardous substances
Health damage or accidents caused by products			●		Manage and understand quality issues that occur in the market as well as their severity, and take action to prevent their recurrence

We assess human rights risks for new businesses. For example, when conducting an acquisition, we examine the target company's compliance with labour standards, health and safety laws, and other regulations as part of due diligence to confirm that there are no serious human rights risks at the company that is newly joining the Group.

Canon Inc. organized dialogues with the Canon Workers' Union in Japan. These discussions addressed issues such as discrimination based on race, gender, or religion; harassment; excessive overtime work; occupational health and safety; and protection of privacy. In 2024, trends in corporate responses to human rights issues were identified, and opinions were exchanged on various concerns, including the active participation of women in the workforce, issues involving LGBTQ+ individuals and people with disabilities, harassment consultations, employee career development, and flexible work styles like telework. The results of these dialogues are considered in identifying and assessing human rights risks for Canon Inc. and consider preventive measures.

In 2024, besides participating in human rights training programmes hosted by the United Nations Development Programme (UNDP), Canon participated in seminars and engaged in individual dialogues with experts worldwide, gathering information on human rights laws and regulations, current societal trends and on good practices at other companies, to use as a reference for our human rights response going forward.

Responsible Minerals Sourcing

The Canon Group has a comprehensive due diligence programme to identify conflict/high-risk regions and avoid the use of materials supplied from business operators disrespecting human rights or environmental conservation in those regions. To reassure customers using Canon products, we are working with suppliers and industry bodies on responsible mineral sourcing initiative. Under the system, the Canon Group investigates the countries of origin of minerals and exercises due diligence, following the 5-step framework recommended by the Organisation for Economic Co-operation and Development (OECD) in its Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). Further information about the program is available in [Canon Sustainability Report](#) on pages 94 and 95.

Canon Europe & Canon UK

Canon Europe and Canon UK have also assessed modern slavery and human trafficking risks within their regional supply chains since 2016. In general, industries with a higher risk of modern slavery incidences include warehousing, distribution, facility management services, manufacturing, and forestry. Canon UK is a member of Tech UK; through industry association it has been brought to our attention that the waste sector has more Modern Slavery related prosecutions than any other sector in the UK. On this basis we are adding “waste contractors” to our list of high-risk contractors. Adhering to Canon’s policies and complying with our Code of Conduct has been fully embedded in Canon UK’s procurement process.

Following the due diligence revision programme that started in 2020, Canon Europe and Canon UK’s supply chain assessment platform underwent enhancements in 2024. We continue to work on a robust assessment process, enabling us to drastically increase traceability, documentation management, mapping, and reporting accuracy.

In addition to local improvements, in 2022, Canon Europe and Canon UK took part in the Canon Group Risk Assessment programme. This programme has been running consistently starting from 2021.

Please refer to our latest official Sustainability Report [Canon Sustainability Report](#) via our website for further details on the Canon Group Risk Assessment programme and its results.

Training and capacity building

To ensure Canon Europe and Canon UK’s new recruits have an adequate level of understanding of Modern Slavery as well as the possible risks in our operations, a bespoke and mandatory Modern Slavery training programme is assigned to new starters. In 2024 we have a 91.54% completion rate.

In 2020, Canon UK and Canon Europe developed and launched an interactive course accessible to all employees. In 2024 we updated the course with latest information available to Canon UK and Canon Europe, as result of this update the refresher course has been relaunched and re-introduced to colleagues. The course aims to refresh employees’ understanding of this important subject and encourage and educate them on raising concerns or suspicions about modern slavery issues in any parts of our business or supply chain via our Speak Up portal.

At Canon Inc., in conjunction with the establishment of the Canon Group Human Rights Policy in 2021, human rights awareness training programme for employees was launched. The aim has been to instil basic knowledge about business and human rights and raise awareness of the Canon Group Human Rights Policy and other human rights initiatives at Canon. Training programs held overseas reflect national and local characteristics, with each company optimizing the content and translating it into each language.

Participation Rates in the Canon Group Human Rights Awareness Training Program			
FY	2021	2022	2023-2024
Target	Canon Inc.	Group companies in Japan	Group companies outside Japan
Participation Rate	92.5%	98.2%	98.0%

Ongoing Monitoring

Canon continuously monitors compliance with the content set out in the Canon Group Human Rights Policy through its risk management and governance structures which are described in its [Canon Sustainability Report](#). The company also pursues ongoing efforts to improve our identification and assessment methods for human rights due diligence, and periodically review them throughout the

Group. It continues to review the Group's human rights initiatives in accordance with social demand, dialogue with stakeholders, and Canon's business operation.

SIGNATURE

This statement is made pursuant to Section 54 of the Modern Slavery Act (2015) in respect of the financial year ended on the 31st of December 2024. The boards of Directors of Canon Europa NV/Canon Europe Ltd/ Canon (UK) Ltd have reviewed and approved it on the 24th June 2025.

A handwritten signature in black ink, appearing to read 'S. Yoshida', with a long horizontal stroke extending to the right.

Shinichi Yoshida

CEO & President Canon Europa NV and Canon Europe Ltd

A handwritten signature in black ink, appearing to read 'G. Jacobs', with a stylized, cursive script.

Guido Jacobs

Senior Managing Director Canon UK Ltd