

Company Name Canon
Industry ICT (Own operations and Supply Chain)
Overall Score 25.2 out of 100

Theme Score	Out of	For Theme
2.2	10	A. Governance and Policies
11.2	25	B. Embedding Respect and Human Rights Due Diligence
5.0	20	C. Remedies and Grievance Mechanisms
4.3	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy: 'Canon commits to respect internationally recognized human rights across its business activities' [Human Rights Policy, 10/2021: global.canon] Met: Universal Declaration of Human rights (UDHR): The Company states in its Human Rights Policy: 'Canon commits to respect internationally recognized human rights across its business activities, as set out in the Universal Declaration of Human Rights [...]' [Human Rights Policy, 10/2021: global.canon] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company states in its Human Rights Policy: 'Canon commits to respect internationally recognized human rights across its business activities, as set out in the [...] UN Guiding Principles on Business and Human Rights'. [Human Rights Policy, 10/2021: global.canon] Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company states in its Human Rights Policy: 'Canon commits to respect internationally recognized human rights across its business activities, as set out in [...] Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises'. [Human Rights Policy, 10/2021: global.canon]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Policy: 'Canon commits to respect internationally recognized human rights across its business activities, as set out in the [...] International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, 10/2021: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: The HR Policy states that 'Canon commits to respect fundamental human rights and prohibit discrimination [...] prohibit child labor and forced labor (including human trafficking), respect freedom of association and the right to collective bargaining in accordance with the laws and regulations of each country and regions [...]'. The Sustainability reports also indicates that 'the Canon Workers' Union commits both sides to work in good faith to peacefully resolve issues in a timely manner'. However, it is not clear whether it is committed to respect the rights of freedom of association and collective bargaining in all contexts and locations as it indicates that it respects these rights 'in accordance with laws and regulations for each country'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law'. [Human Rights Policy, 10/2021: global.canon] & [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core • Not Met: Company explicitly list All four ILO for suppliers: The Company indicates in its Supplier Code that it has adopted RBA Code of Conduct 'as a responsible sourcing policy, and renamed the Canon Supplier CSR Guidelines to the Canon Supplier Code of Conduct'. With respect ILO Core, this document reads: 'Child labor is not to be used in any stage of manufacturing. [...] Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. [...] Non-Discrimination [...]. And with respect the rights of freedom of association and collective bargaining it indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in conformance with local law'. [Supplier Code of Conduct, 01/2021: global.canon]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Company states that it ensures 'occupational health and safety, and prevent occupational injuries' [CSR Basic Statement, 10/2021: global.canon] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The CSR statement indicates that it 'aims to prevent excessive overtime work and grant appropriate holidays'. However, no evidence found in a policy statement of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. The Company has provided feedback to CHRB regarding this indicator. However, it was not material (about compensation system). In addition, evidence for policy indicators should be placed in formal policy documents as per CHRB requirements. [CSR Basic Statement, 10/2021: global.canon] & [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company has adopted RBA Code, which includes health and safety standards requirements with respect: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing and Health and Safety Communication. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: According to its Supplier Code: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 01/2021: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Responsible mineral sourcing: The Basic Policy on Responsible Minerals Sourcing: 'For materials originating from tantalum, tin, gold or tungsten (conflict minerals) as well as other materials originating from minerals that Canon has determined to be a high-risk, in order to (1) verify that said materials do not constitute sources of funds belonging to armed groups that are located in the Democratic Republic of the Congo or adjoining countries in Central Africa as well as (2) avoid sourcing said materials from processing sites, etc. with an elevated level of human rights risk or environmental risk that are located in conflict/high-risk regions around the world, the Canon Group will conduct a "reasonable country of origin inquiry" or due diligence in accordance with the OECD Due Diligence Guidance'. [Basic Policy on Responsible Minerals Sourcing, N/A: global.canon] • Met: Based on OECD Guidance: The Company indicates in its Basic Policy on Responsible Minerals Sourcing: 'Canon Group will conduct a "reasonable country of origin inquiry" or due diligence in accordance with the OECD Due Diligence Guidance'. [Basic Policy on Responsible Minerals Sourcing, N/A: global.canon] • Met: Requires suppliers to commit to responsible mineral sourcing: According to its Supplier Code: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. [Supplier Code of Conduct, 01/2021: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: The Company describes in its sustainability report the due diligence process conducted '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) (Third Edition)'. However, no explicit commitment found to extend the process beyond 3TG and covering all minerals. [Sustainability report 2022, 2022: global.canon] • Not Met: Suppliers expected to make similar requirements of their suppliers: As indicated above, although the Company commits to OECD Guidance and follows OECD framework, no evidence found of policy requirement for suppliers to extend the process beyond 3TG and covering all minerals. [Sustainability report 2022, 2022: global.canon]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: The Company has a formal commitment to respect human rights and a human rights policy which is disclosed within the Company sustainability report. It includes a commitment to ILO Declaration and the OECD Guidelines for MNEs. The Company also express commitments to different labor rights. However, no evidence found to explicitly respecting women rights or to the Women Empowerment Principles in its policies. [Sustainability report 2022, 2022: global.canon] & [Diversity and Inclusion, N/A: global.canon] • Not Met: Children's rights: The Company has a formal commitment to respect human rights and a human rights policy which is disclosed within the Company sustainability report. It includes a commitment to ILO Declaration and the OECD Guidelines for MNEs. The Company also express commitments to different labor rights. However, no evidence found to explicitly respecting children rights or to Convention on the Rights of the Child or the Children's rights and business principles.. [Sustainability report 2022, 2022: global.canon] • Not Met: Migrant worker's rights: The Company has a formal commitment to respect human rights and a human rights policy which is disclosed within the Company sustainability report. It includes a commitment to ILO Declaration and the OECD Guidelines for MNEs. The Company also express commitments to different labor rights. However, no evidence found to explicitly respecting migrant rights or to the Convention on the Protection of the Rights of All Migrant Workers and Members of their families. [Sustainability report 2022, 2022: global.canon] • Met: Expects suppliers to respect at least one of these rights: Its Supplier Code reads: 'Participants are committed to uphold the 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'. [Supplier Code of Conduct, 01/2021: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: The Company commits to remedy: The Company states in its Human Rights Policy: 'When Canon identifies that it has caused or contributed to adverse human rights impacts, Canon will take appropriate steps to remedy the situation'. The Company also reports stakeholder engagement in the process of potential impact identification, following its commitment of dialogue with stakeholders included in the Human Rights Policy. [Human Rights Policy, 10/2021: global.canon] & [Sustainability report 2022, 2022: global.canon] • Not Met: Company expect suppliers to make this commitment: The Company states that 'we have established a point of contact in our website for external stakeholders to report specific human rights concerns in Canon's corporate activities [...] Canon takes appropriate steps to remedy the situation following an investigation of the facts in each case. It also states that has set up a hotline to allow anyone inside or outside the company to freely report any concerns about the supply chain. This enables whistleblowers to share any specific concerns or information. However, no evidence found of a requirement for suppliers for suppliers to commit to remedy adverse impacts that they cause while performing work for the Company. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: The Company states that 'The RBA, of which Canon is a member, offers a grievance mechanism called the Worker Voice Platform, through which Canon's stakeholders can report specific human rights concerns'. [Sustainability report 2022, 2022: global.canon] • Not Met: Work with suppliers to remedy impact: The Company states that 'we have established a point of contact in our website for external stakeholders to report specific human rights concerns in Canon's corporate activities [...] Canon takes appropriate steps to remedy the situation following an investigation of the facts in each case. However, no formal statement of commitment found in a policy document (CHRB requirement for Company statements in policy section) to work together with suppliers to remedy adverse impacts caused or contributed to. [Sustainability report 2022, 2022: global.canon]
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company's human rights policy is signed by the CEO. The Sustainability report also indicates that 'From 2022, potential human rights violation risks have been identified as significant risk by the Risk management Committee established by 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. However, although the Board is briefed, no evidence found of a Board of Directors' (supervisory board) level committee with explicit governance oversight over human rights implementation. Evidence found seems to refer to risk management, which is settled at executive level (chaired by executive VP). [Sustainability report 2022, 2022: global.canon] • Not Met: Describe HR expertise of Board member

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: There's a letter from the Chairman & CEO in the sustainability report. However, it refers to different sustainability-related topics, without a particular focus on human rights. This subindicator looks for evidence of a speech, presentation or letter that clearly signals the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Sustainability report 2022, 2022: global.canon]
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Company indicates that 'At Canon, the sustainability, legal, and human resources divisions of Canon Inc. serve as the promotion secretariat pursuing human rights measures with the cooperation of procurement departments. From 2022, potential human rights violation risks have been identified as a significant risk by the Risk Management Committee established by 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'. However, current evidence seems to refer to the Board of directors being briefed by the Risk Management Committee in relation to human rights risks. No further details were found, including who is the actual person or committee within the Board of directors that processes, discusses and reviews human rights strategy or management processes following this Risk management briefings. [Sustainability Report 2020, 07/2020: global.canon] • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. [Sustainability report 2022, 2022: global.canon]
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The Company indicates, in its Sustainability Report 2021, that 'The remuneration of Representative Directors and Executive Directors consists of a basic remuneration, which is a fixed amount, paid each month, as a compensation for execution of duties required in accordance with their position and the degree to which they contribute in their role, a bonus that is linked to the Company's business performance in each business year, and a stock-type compensation stock option plan to provide an incentive to improve medium- to long-term performance and raise corporate value.' The CEO, COO and CFO are also board members. However, no further description found of human rights topics being included in incentives. [Sustainability Report 2021, 2021: global.canon] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy: The Sustainability report states that 'The Sustainability Headquarters of Canon Inc. coordinates activities across the Group that are aimed at promoting sustainability from both social and environmental perspectives. It works together with other divisions to address any issues that demand inter-departmental cooperation. The Group Executive for Sustainability Headquarters, who is an executive officer of Canon Inc., reports on crucial sustainability-related matters to the Chairman & CEO and Executive Vice President and receives approval for the direction and measures guiding our response to risks and opportunities'. It also states that At Canon, the sustainability, legal, and human resources divisions of Canon Inc. serve as the promotion secretariat pursuing human rights measures with the cooperation of procurement departments. From 2022, potential human rights violation risks have been identified as a significant risk by the Risk Management Committee established by 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. However, it is not clear which is the person or committee within the Board of directors that uses

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			<p>information provided by the Risk Management Committee, and how uses it to discuss and review the Company's business model for inherent risks to human rights at board level or a board committee (risk management committee seems to be a senior executive business body, chaired by a Company VP, and not a Board of Directors' committee). [Sustainability report 2022, 2022: global.canon]</p> <ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing: As indicated above 'The Group Executive for Sustainability Headquarters, who is an executive officer of Canon Inc., reports on crucial sustainability-related matters to the Chairman & CEO and Executive Vice President'. Also, ' 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'. However, it is not clear how a Board of Director's committee or person is responsible to use this information, and the frequency and triggers that make the Company reviewing business model or strategy and potential impacts of these on human rights. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: In its Sustainability Report 2021, the Company indicates: 'At Canon, the CSR Division of Canon Inc. coordinates CSR-related activities across the Group, [...]. The CSR Division reports on CSR-related matters to the director in charge of CSR (Executive Vice President) as needed and receives relevant directions'. CSR related activities include human rights. [Sustainability Report 2021, 2021: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In its Sustainability Report 2021, the Company indicates: 'At Canon, the CSR Division of Canon Inc. coordinates CSR-related activities across the Group, working together with other relevant divisions to address any CSR-related issues that require inter-departmental cooperation, such as environmental, quality, procurement, human resource, facilities management, legal, IR or PR issues. In fields with high societal expectations, such as environmental protection, compliance, or quality management, our response is led by the division in charge of the relevant area. The CSR Division reports on CSR-related matters to the director in charge of CSR (Executive Vice President) as needed and receives relevant directions'. CSR includes human rights. [Sustainability Report 2021, 2021: global.canon] • Met: Day-to-day resources and expertise allocation in own ops: The Company indicates that 'the sustainability, legal, and human resources divisions of Canon Inc. Serve as the promotion secretariat pursuing human rights measures with the cooperation of procurement departments'. It also indicates that, following the integration of human rights within risk management, 'each Canon. Inc division and Group company is implementing initiatives to prevent and mitigate human rights risks'. [Sustainability report 2022, 2022: global.canon] • Not Met: Resources and expertise allocation in the supply chain: It also states, regarding supply chain management, that 'we established the Canon Group Procurement Code of Conduct for Executives and Employees in Charge of Procurement, which stipulates appropriate actions that persons in charge of procurement as well as executives and employees responsible for placing orders should keep closely in mind in order to maintain high standards of legal compliance and corporate ethics. Also, Canon's business processes are uniform across its global network based on a common set of detailed rules on procurement practices in place for Group companies worldwide. To ensure company-wide consistency and uniformity, a department in charge of internal Group controls was set up in the procurement division at Canon Inc. to maintain the rules, monitor compliance, and provide training for employees'. No details found, however, on whether there's specific expertise or resources in this context that have a particular human rights perspective. [Sustainability report 2022, 2022: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights: The Company indicates, in its Sustainability Report 2021, that 'The remuneration of Representative Directors and Executive Directors consists of a basic remuneration, which is a fixed amount, paid each month, as a compensation for execution of duties required in accordance with their position and the degree to which they contribute in their role, a bonus that is linked to the Company's business performance in each business year, and a stock-type compensation stock option plan to provide an incentive to improve medium- to long-term performance and raise corporate value.' However, no evidence found on whether human rights aspects are linked to the evaluation of performance. [Sustainability Report 2021, 2021: global.canon] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company states that 'from 2022, potential human rights violation risks have been identified as significant by the Risk Management Committee established by resolution of the Board of Directors. Each Canon Inc. Division and Group company is implementing initiatives to prevent and mitigate human rights risks'. [Sustainability report 2022, 2022: global.canon] & [Sustainability Report 2020, 07/2020: global.canon] • Met: Provides an example: In the context of risk assessment (and included within the management system described above), the Company discloses the following: Discrimination, harassment, child labor, forced labor, unpaid wages/low wages, excessive overtime work, occupational health and safety'. Although these are included as salient risks in the context of the due diligence, the Company indicates that these have been identified as significant risks by the Risk Management Committee that reports to the Board. The Company, in this same context of both due diligence and risk integration withing the Company's risk management system, refers to different parts of the sustainability report in relation to measures taken. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: The Company indicates that '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'. The Convocation of the Shareholders meeting document for 2022 indicates that 'Audit and Supervisory Board Members shall grasp the execution of duties by Officers, attending not only meetings of the Board of Directors, but also other important meetings such as meetings of the Corporate Strategy Committee and Risk Management Committee'. It also states that . Audit and Supervisory Board Members, including Outside Audit and Supervisory Board Members, attend all the Board of Directors meetings, and full-time Audit and Supervisory Board Members attend all meetings of the Corporate Strategy Committee and the Risk Management Committee. [Notice of Convocation of the Ordinary General Meeting of shareholders, 2022/03: global.canon] & [Sustainability report 2022, 2022: global.canon]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates in its Sustainability Report 2021: 'To instil CSR awareness across the entire Group, management executives from Canon's headquarters and product operations divisions and Group companies in Japan and overseas are given briefings annually on CSR-related matters, including the basic approach, specific CSR initiatives, the UN-adopted SDGs, and ESG investment. For specialized topics, such as quality assurance, environmental protection, information management, or compliance, the respective division provides employee training as required. In addition, the CSR managers from Group companies around the world meet regularly to share information, while the company intranet and in-house magazine are used to share with employees information on Group CSR activities, action on the SDGs, and other related topics as a way of promoting dynamic CSR initiatives across the Group. The sustainability report 2022 states that 'In conjunction with the establishment of the Canon Group Human Rights Policy, we carried out an e-learning program for employees with the aim of instilling basic knowledge about

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business and human rights and widely informing Canon’s human rights initiatives. In 2021, a total of 23,313 Canon Inc. employees completed the program (92.5% participation rate), which was open to all staff. From 2022, the program will be rolled out successively to Group companies'. Although the training does not seem to cover all employees yet, it is being rolled out and are plans to continue in 2022. Training actions are assumed to take place in local languages. [Sustainability Report 2021, 2021: global.canon] & [Sustainability report 2022, 2022: global.canon]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Sustainability report states that 'Canon thinks it is important to have ongoing dialogue with its diverse stakeholders to communicate the company’s thinking to them and to listen carefully to their feedback with the aim of deepening mutual understanding. We consequently strive to maintain close communication with stakeholders [...]. Responding to the issues identified based on the opinions we receive from stakeholders, we deal appropriately with the needs of each region, and at the same time, we share important issues related to global management throughout the Group and work to resolve them. [...]. We are working to enhance Canon’s activities further through appropriate opinion exchanges with corporate consultants, investors, and experts, as well as a range of NGOs and NPOs. [...] We also try to ensure report disclosures meet the expectations of all stakeholders by canvassing the views of investors, shareholders, and sustainability experts'. Although the Company discloses examples of engagement, this subindicator looks for specific of whether and how the Company has actively communicated its human rights commitments to (external)affected stakeholders. • Not Met: How policy commitments are made accessible to audience: In its Sustainability Report 2020, the Company included a specific section addressed to communicate its CSR Basic Statement and its Supplier CSR Guidelines to its Stakeholders: 'In recent years, the environment, human rights and labor issues have been topics of increasing attention, and various stakeholders are calling into question the scope of our social responsibility initiatives across our supply chain'. Also, as indicated above, the company tries 'to ensure report disclosure meet the expectation of all stakeholders' and provides examples of stakeholder engagement. However, it is not clear how the Company proactively communicates its policy commitments to affected stakeholders among local communities and other stakeholders, and how it ensures the form and frequency of the information communicated is accessible to its intended audience. [Sustainability report 2022, 2022: global.canon] & [Sustainability Report 2020, 07/2020: global.canon]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company 'holds business briefings for suppliers at each Canon Inc. operational site and each Group production site, asking for their understanding of procurement policies and cooperation with business plans. Additionally, to directly communicate Canon’s procurement policy to our major suppliers and report on related activities, each year since 2018, we have held an annual Procurement Policy Explanation Seminar, at which the Group Executive in charge of Procurement Headquarters explains company policy, including strengthening of links with suppliers'. Moreover, its 'efforts to ensure socially responsible procurement are based on the Canon Supplier CSR Guidelines, which direct our interaction with suppliers to ensure that our procurement activities throughout the global supply chain take account of human rights, labor, health and safety, compliance, the environment and other relevant issues. Formulated with reference to the standards of the International Labour Organization (ILO) and the guidance of the Responsible Business Alliance (RBA), the guidelines require our suppliers to check that appropriate consideration is given to such issues as child labor, forced labor including human trafficking, discrimination, minimum wage standards, working hours, and employee communication. Canon also requires that its suppliers ask the same of their upstream suppliers (second-tier suppliers for Canon). Canon publishes the guidelines on its corporate website to make them widely available for the information of stakeholders and also makes them known to suppliers at the time of its annual survey'. [Sustainability Report 2020, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual: The Company indicates in its Sustainability Report 2021: 'All Canon production sites are required to adhere to various Canon Group policies covering matters such as human rights, labor, the environment, legal compliance, procurement and security. These policies include the Canon Group Code of Conduct, the Canon Group CSR Basic Statement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and the Canon Group Environmental Charter. [...] Canon established the Procurement Policy as its basic stance toward procurement, and seeks the understanding and cooperation of our suppliers. Moreover, we have formulated the Canon Supplier Code of Conduct, which is based on the RBA Code of Conduct, as the basis for ensuring socially responsible procurement activities. [...] With the aim of improving CSR in the supply chain, Canon requests suppliers of our main business ("major suppliers") to sign a letter of agreement of the RBA Code of Conduct. In 2020, we sent out requests to 271 major suppliers and received agreements from 257 firms (a 95% response rate)'. In the 2022 report, it states that 'we have collected a letter of agreement confirming adherence to the RBA Code of Conduct from our major suppliers' It is not clear, however, whether contractual requirements are compulsory for suppliers generally.</p> <p>[Sustainability Report 2021, 2021: global.canon] & [Sustainability report 2022, 2022: global.canon]</p> <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates that 'In conjunction with the establishment of the Canon Group Human Rights Policy, we carried out an e-learning program for employees with the aim of instilling basic knowledge about business and human rights and widely informing Canon's human rights initiatives. In 2021, a total of 23,313 Canon Inc. employees completed the program (92.5% participation rate), which was open to all staff. From 2022, the program will be rolled out successively to Group companies'. [Sustainability Report 2021, 2021: global.canon] • Not Met: Trains relevant managers including procurement: The Company indicates in its Sustainability Report 2021: 'To instil CSR awareness across the entire Group, management executives from Canon's headquarters and product operations divisions and Group companies in Japan and overseas are given briefings annually on CSR-related matters, including the basic approach, specific CSR initiatives, the UN-adopted SDGs, and ESG investment. For specialized topics, such as quality assurance, environmental protection, information management, or compliance, the respective division provides employee training as required. In addition, the CSR managers from Group companies around the world meet regularly to share information, while the company intranet and in-house magazine are used to share with employees information on Group CSR activities, action on the SDGs, and other related topics as a way of promoting dynamic CSR initiatives across the Group.' However, although procurement divisions seems to be trained to ensure compliance with Procurement Code of Conduct for Executives and Employees in Charge of Procurement, it is not clear whether relevant managers, including procurement, have received human rights training. The Procurement Policy found does not contain the Company's human rights policy. In the sustainability report 2022, as indicated above, 93% of the Company's employees received human rights training. However, no evidence found of how relevant managers and workers, including procurement, receive specific human rights training relevant to their role. [Sustainability Report 2021, 2021: global.canon] & [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its Sustainability Report 2021: 'Since 2013, we have been carrying out annual investigations at the Group's main overseas manufacturing companies,* primarily in Asia, to confirm their compliance with laws pertaining to minimum working age and health considerations. In 2015, we developed labor guidelines in accordance with local social contexts and each company's human resources management regulations. Results of investigations are shared with the Group Executive of Human Resources Management & Organization Headquarters and other related division heads. If an issue is identified, related divisions work together toward a swift resolution. To date, investigations have not identified any issues. Canon Inc., Group companies in Japan, and major overseas

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sales companies also regularly conduct employee awareness surveys. Survey results are reported to management executives and shared with employees through the company intranet and other means. Furthermore, when an issue is identified, we take necessary action to change the corporate culture. Since joining RBA, Canon has made use of the RBA's Self-Assessment Questionnaire. In terms of existing business operations, the Group's main manufacturing companies have sought to identify any risks related to rights, labor standards, or safety and health. We are also establishing response measures according to the seriousness of the risks that are identified.' In the Sustainability Report 2019, the Company indicates: 'Canon Group manufacturing companies conduct business while adhering to Group policies regarding such matters as human rights, labor, the environment, legal compliance, procurement and security, including the Canon Group CSR Basic Statement, the Canon Group Code of Conduct and the Canon Group Environmental Charter. When necessary, Headquarters divisions, products operations, and audit divisions at Canon Inc. Verify the situation at Group companies as a whole, be they in Japan or overseas, from the standpoints of internal controls and risk management'. With respect supply chain monitoring process, the Company reports: 'conduct on-site audits of suppliers with low evaluations, and provide guidance and education for improvement. In particular, Canon may choose to terminate business with suppliers if they are not complying with laws and social agreements covering areas such as human rights, labor, and the environment. [...] At the same time, we are working to identify CSR risks using the RBA Self-Assessment Questionnaire (SAQ). In 2020, we conducted a survey of 271 major suppliers using the SAQ and received responses from 249 suppliers (392 sites)'. [Sustainability Report 2021, 2021: global.canon] & [Sustainability Report 2019, 05/2019: global.canon]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: The Sustainability report 2022 states that 'Canon production sites also have partnerships with thousands of suppliers unaffiliated with the Canon Group, from whom they purchase considerable numbers of components, such as electronic parts, mechanical parts, units and materials'. It also indicates that 'In 2021, we sent out the questionnaire [RBA SAQ] to 346 suppliers related to major business operations ("major suppliers") and received responses from 330 companies (representing 491 sites). No High Risk businesses were identified among these suppliers, but we provided feedback on the results of labor, health and safety, the environment and ethics to our major suppliers and requested that they identify weaknesses and improve on them. No evidence found, however, of the proportion of supply chain that is being monitored beyond major suppliers. [Sustainability report 2022, 2022: global.canon] • Not Met: Describe how workers are involved in monitoring: As indicated above, the Company 'sent out the questionnaire to 346 suppliers related to major business operations ("major suppliers") and received responses from 330 companies (representing 491 sites). It is not clear, however, how company workers are actively involved in the monitoring process. The Company has provided additional comments to CHRB regarding this subindicator. However, evidence was not material. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: The Sustainability report indicates that, following the questionnaires responded described above, 'no high risk businesses were identified among these suppliers, but we provided feedback on the results of labor, health and safety, the environment and ethics to our major suppliers and requested that they identify weaknesses and improve on them'. No evidence was found, however, about the corrective action process that the Company implements whenever a non-compliance is found. The company has provided additional comments to CHRB regarding this subindicator. However, evidence was not material. [Sustainability report 2022, 2022: global.canon] • Not Met: Disclose findings and number of corrective action: See above. No description was found, however, on what was found beyond that no high risk businesses were identified, including the number of corrective actions needed. [Sustainability report 2022, 2022: global.canon]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: As part of its relations with suppliers, 'Canon undertakes a review, based on the Canon Supplier CSR Guidelines and other reference standards, of whether the supplier meets standards in such areas as corporate ethics (legal compliance, product safety, management of confidential information, human rights, labor, health and safety, intellectual property rights protection, etc.), (...). With regard to the topics of human rights and labor, especially, survey items are set with reference to ILO standards and the guidance of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the RBA. We confirm whether appropriate consideration is given to such issues as child labor, forced labor that includes trafficking of persons, discrimination, minimum wage, working hours, and employee communication. [...] When considering new suppliers, only those who meet the above standards are added to the list of existing registered suppliers, from which procurement partners are selected'. [Sustainability Report 2020, 07/2020: global.canon]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: It also indicates: 'Canon may choose to terminate business with suppliers if they fail to abide by laws and ordinances covering such areas as human rights and labor.' [Sustainability Report 2020, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe positive incentives offered to respect human rights: The Company indicates in its Sustainability Report 2020 that it conducts ' We also conduct an annual survey of all companies registered on our supplier list. The survey results, along with performance as a supplier, form part of an overall evaluation of the business partner, which is recorded in the supplier list, allowing us to give preference to high-scoring suppliers'. Supplier CSR guidelines include human rights and labour standards. [Sustainability Report 2020, 07/2020: global.canon] • Not Met: Working with suppliers to meet HR requirements: The Company indicates in its Sustainability Report 2021: 'We are working with suppliers to develop a socially responsible global Canon supply chain on issues such as labor, occupational health and safety, the environment, business ethics and management systems.' However, no details, found on the actual work carried out to improve human rights performance. The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material, as it didn't include specific activities conducted directly with suppliers to help them improve their performance in a proactive way. [Sustainability Report 2021, 2021: global.canon]
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company states that it strives 'to maintain close communication with stakeholders using departments in charge at Group companies worldwide as points of contact. Responding to the issues identified based on the opinions we receive from stakeholders, we deal appropriately with the needs of each region, and at the same time, we share important issues related to global management throughout the Group and work to resolve them. Comments or requests received from external stakeholders via the Canon CSR website* are shared with relevant departments and answered promptly. We are working to develop Canon's CSR activities further through appropriate opinion exchanges with corporate consultants, investors, and CSR experts, as well as a range of NGOs and NPOs.' In addition, it introduces a table with its methods of communicating with stakeholders and present specific initiatives, covering all stakeholder groups that Canon believes to be of high importance for its business activities. However, no further information found describing how it has identified its stakeholders. The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for a description of how it has identified stakeholders with whom to engage (how they are affected by the Company's activities) in last two years. Although the Company discloses engagement with stakeholders. [Sustainability Report 2021, 2021: global.canon] • Met: Discloses stakeholders that HRs may be affected: The Company discloses a table showing the different salient issues that have been identified and the rights-holders that are affected by them. Suppliers and contractors can be affected by child labor, forced labor, unpaid/low wages, excessive overtime work and occupational health and safety. Canon employees can be affected by discrimination based on different factors, harassment, excessive overtime work, health and safety, and protection of privacy. Privacy and health damage caused by products are potential impacts for consumers. Finally, local communities can be affected by the procurement of conflict minerals and noise and environmental pollution at operational sites. [Sustainability report 2022, 2022: global.canon] • Not Met: Provides two examples of engagement with stakeholders: The Company indicates that 'in 2021, to identify salient human rights risks for Canon as part of human rights due diligence, we held dialogues with the Canon Workers' Union that represents our employees in Japan. In the dialogue, we confirmed the recognition of the workers' union on discrimination [...] as a result of the dialogue, we were able to deepen mutual understanding, and confirmed our commitment to continue the dialogue. The Company also reports engagement with employees in relation to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>'social issues Amid the COVID-19 Pandemic'. However, it seems that these workshops were meant to 'help individual employees gain a deeper understanding of social issues with the aim of promoting in-house innovation' rather than dialoguing in relation to potential human rights issues. Finally the Company also discloses a list of initiatives conducted with different stakeholders, but no similar examples to the one with the workers' union was found [Sustainability report 2022, 2022: global.canon]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues: Regarding the engagement conducted with worker union, the Company states the following. 'In 2021, to identify salient human rights risks for Canon as part of human rights due diligence, we held dialogues with the Canon Workers' Union that represents our employees in Japan. In the dialogue, we confirmed the recognition of the workers' union on discrimination based on such factors as race, gender, or religion, harassment, excessive overtime work, occupational health and safety, and protection of privacy, which are considered to be human rights risks for employees in particular. We also widely exchanged opinions on human rights risks, and the results were reflected in identifying salient human rights risks for Canon. The workers' union also presented specific examples of flexible work styles during the COVID-19 pandemic. As a result of the dialogue, we were able to deepen mutual understanding, and confirmed our commitment to continue the dialogue'. However, in order to award this subindicator, evidence must refer to either a summary of the views gathered from different stakeholders, or provide at least two different examples of affected stakeholder inputs. [Sustainability report 2022, 2022: global.canon] • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The Company indicates that 'In 2021, based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct, Canon implemented human rights due diligence throughout the entire Group. To implement human rights due diligence, each Canon Inc. division and Group company worked within the framework of the Risk Management Committee to first identify and evaluate the potential adverse human rights impacts in their respective business activities, including the supply chain, and identified the salient human rights risks. Subsequently, the promotion secretariat aggregated, analyzed and evaluated those risks, and through stakeholder engagement, identified salient human rights risks for Canon'. [Sustainability report 2022, 2022: global.canon] • Not Met: Identifying risks through relevant business relationships: As indicated above, the process included the supply chain. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company conducted its process in 2021 and consulted with external experts: 'we received expert advice from the UK-based sustainability consulting firm Sancroft on the formulation of human rights policy and human rights due diligence (identifying human rights)' and also with Canon Workers' Union (Japan), as described in indicator B.1.8. [Sustainability report 2022, 2022: global.canon] • Met: Triggered by new circumstances: It also states that 'Canon also assesses human rights risks for new businesses. For example, when conducting M&As, we review the status of compliance with laws and regulations related to labor standards and health and safety as part of our due diligence, to ensure that there are no serious human rights risks in the company newly joining the Group'. [Sustainability report 2022, 2022: global.canon] • Not Met: Describes risks identified: Although the Company discloses risks and impacts identified, this subindicator looks for evidence of specific risks identified in relation to new circumstances that triggered a due diligence action. [Sustainability report 2022, 2022: global.canon]
B.2.2	Assessing human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The Sustainability report indicates that 'In 2021, based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Responsible Business Conduct, Canon implemented human rights due diligence throughout the entire Group. To implement human rights due diligence, each Canon Inc. division and Group company worked within the framework of the Risk Management Committee to first identify and evaluate the potential adverse human rights impacts in their respective business activities, including the supply chain, and identified the salient human rights risks. Subsequently, the promotion secretariat aggregated, analyzed and evaluated those risks, and through stakeholder engagement, identified salient human rights risks for Canon. In assessing human rights risk, we also referred to the human rights risk country/region index provided by the Responsible Business Alliance (RBA)'. [Sustainability report 2022, 2022: global.canon]</p> <ul style="list-style-type: none"> • Met: How process applies to supply chain: As indicated above, the process also included the supply chain. [Sustainability report 2022, 2022: global.canon] • Met: Public disclosure of the results of HR assessment: The Company discloses a table showing the different salient issues that have been identified and the rights-holders that are affected by them. Suppliers and contractors can be affected by child labor, forced labor, unpaid/low wages, excessive overtime work and occupational health and safety. Canon employees can be affected by discrimination based on different factors, harassment, excessive overtime work, health and safety, and protection of privacy. Privacy and health damage caused by products are potential impacts for consumers. Finally, local communities can be affected by the procurement of conflict minerals and noise and environmental pollution at operational sites. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Met: How it involved affected stakeholders in the assessment: In relation to involvement of stakeholders in assessment of identification and risk assessment, it indicates that 'In 2021, to identify salient human rights risks for Canon as part of human rights due diligence, we held dialogues with the Canon Workers' Union that represents our employees in Japan. In the dialogue, we confirmed the recognition of the workers' union on discrimination based on such factors as race, gender, or religion, harassment, excessive overtime work, occupational health and safety, and protection of privacy, which are considered to be human rights risks for employees in particular. We also widely exchanged opinions on human rights risks, and the results were reflected in identifying salient human rights risks for Canon. The workers' union also presented specific examples of flexible work styles during the COVID-19 pandemic'. [Sustainability report 2022, 2022: global.canon]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Sustainability report describes measures taken for each of the human rights issues considered to be salient for its won workforce, including discrimination, harassment, excessive overtime work, occupational health and safety and protection of privacy. [Sustainability report 2022, 2022: global.canon] • Not Met: Description of how global system applies to supply chain: In relation to managing salient issues in the supply chain, the Company refers the following: 'In 2021, Canon established the Canon Supplier Code of Conduct, which adopts the RBA Code of Conduct, and is promoting its procurement activities taking labor, health and safety, environment, and management systems into account. We have collected a letter of agreement confirming adherence to the RBA Code of Conduct from our major suppliers. In addition, to prevent child labor, forced labor, unreasonable restrictions on movement, and excessive overtime work and to ensure occupational health and safety at suppliers, we conduct yearly self-assessments using the RBA's Self-Assessment Questionnaire. Canon is also working with suppliers and industry bodies on responsible mineral sourcing initiatives'. The Company also refers to the screening of potential suppliers before starting dealings. However, this evidence seems to focus in monitoring compliance with policy commitments and requirements. This subindicator looks for proactive actions taken for each specific issue (from a risk-based approach), in order to prevent the impact from happening, or address the specific issue that is at risk. The Company also refers to the Grievance mechanism. However, as indicated, this subindicator looks for a proactive approach to address risks and impacts. [Sustainability report 2022, 2022: global.canon] • Met: Example of actions decided on at least 1 salient HR issues: In relation to excessive working hours, for instance, the Company reports the following: 'Canon has established a system to accurately ascertain the working hours of employees at overseas production sites, where the risk of excessive overtime work is considered to be comparatively high. The operational status of this system is reported annually

Indicator Code	Indicator name	Score (out of 2)	Explanation
			to the human resource division of Canon Inc. In addition, in 2015, we established labor guidelines in accordance with social conditions in local areas and the human resource management regulations of each Group manufacturing company to ensure thorough compliance'. Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: The Company indicates that 'Canon continuously monitors compliance with the content set out in the Canon Group Human Rights Policy. We also pursue ongoing efforts to improve our identification and assessment methods for human rights due diligence, and periodically review them throughout the Group. We also review the Group's human rights initiatives in accordance with social demand, dialogue with stakeholders, and Canon's business operation'. No evidence found, however, on the specific processes it has in place to determine whether broad action plans taken to mitigate risks and impacts are being effective. [Sustainability report 2022, 2022: global.canon] • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided evidence of stakeholder engagement in its feedback to CHRB. However, it was not material to this indicator. This subindicator looks for engagement in specific cases where human right impacts have been raised by affected stakeholders or their representatives. Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states that 'Canon Inc. has established a Compliance Hotline system to receive information related to compliance issues. The confidentiality of reporters is strictly maintained, and they are guaranteed not to suffer any unfair treatment for using the system. We continually work to encourage appropriate use of the system by expounding the purpose of the system through such means as the intranet compliance website and compliance training, etc'. In addition, the Company's engagement channel with employees include 'Whistleblower system'. [Sustainability Report 2020, 07/2020: global.canon] Score 2 <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: It also indicates that 'Canon has established an internal reporting system at nearly all Group companies worldwide through which employees can report specific human rights concerns in the local language. We also strive to make the reporting system known through the company intranet and training programs'. Also, workers have been trained in the Human rights policy, which contains references to grievance mechanism. [Sustainability report 2022, 2022: global.canon] & [Responsible business conduct hotline website, N/A: global.canon] • Met: Describe how workers in the supply chain have access to grievance mechanism: Its Supplier Code of Conduct requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' [Supplier Code of Conduct, 01/2021: global.canon] • Met: Expect Suppliers to convey expectation to their own suppliers: Its Supplier Code of Conduct requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [Supplier Code of Conduct, 01/2021: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Sustainability report indicates that 'we have established a point of contact in our website for external stakeholders to report specific human rights concerns in Canon's corporate activities'. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: See above. The Company has mechanisms available for external stakeholders. However, no details were found in these sources neither in relation to whether channels for external stakeholders are accessible in local languages (or whether they can file grievances in their own language) and how they are proactively made aware of the existence of the mechanisms. [Responsible business conduct hotline website, N/A: global.canon] & [Sustainability report 2022, 2022: global.canon] • Met: Communities access mechanism direct or through suppliers: The Sustainability report, in relation to 'hotline for risks in the supply chain', indicates that 'Canon has set up a hotline to allow anyone inside our outside the company to freely report any concerns about the supply chain. This enables whistleblowers to share any specific concerns or information relating to issues such as child labor, forced labor, or other problems in the areas of human rights and occupational health and safety. This process is detailed in the Canon Supplier Code of conduct and publicized'. [Sustainability report 2022, 2022: global.canon] & [Supplier Code of Conduct, 01/2021: global.canon] • Met: Expect supplier to convey expectation to their own suppliers: See above. The Mechanism described refers to Canon's supply chain in general. [Sustainability report 2022, 2022: global.canon] & [Supplier Code of Conduct, 01/2021: global.canon]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Sustainability report indicates that 'when a report is received of a possible compliance violation, and investigation is launched to establish the facts and a final decision is made as to whether infringement has taken place'. However, no further details found, including response timescales and description of how complainants will be informed. [Sustainability report 2022, 2022: global.canon] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: It also adds that 'if a compliance violation is determined to have occurred, the necessary corrective action is taken along with measures to prevent recurrence'. However, no further details found, including explaining the type of outcome to the complainant through the use of the grievance mechanism. [Sustainability report 2022, 2022: global.canon] • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company indicates that it has established 'an internal reporting system at nearly all Group companies worldwide through which employees can report specific human rights concerns in the local language [...] In addition, we have established a point of contact in our website for external stakeholders to report specific human rights concerns in Canon's corporate activities. In both internal and external contact points maintain the privacy of informants and allow them to report anonymously to ensure that they do not suffer unfair treatment as a result' [Sustainability report 2022, 2022: global.canon] • Met: Practical measures to prevent retaliation: As indicated above, internal and external contact points 'allow them [informants] to report anonymously to ensure that they do not suffer unfair treatment as a result'. [Sustainability report 2022, 2022: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The supplier code states that 'Canon has established hotlines for both inside and outside the Company. Should anyone have any specific concerns or information regarding human rights, labor, health and safety and other similar issues in Canon's supply chain [...] please contact Canon using the following page [...]'. The reporting website states the following: 'Anonymous report is acceptable, but please note that it may be difficult to track and confirm the facts. Canon will not retaliate against anyone for reporting a concern honestly and in good faith'. [Supplier Code of Conduct, 01/2021: global.canon] & [Responsible business conduct hotline website, N/A: global.canon]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights: The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. It also added a specific comment. However, this was not found in publicly available sources. • Not Met: Company does not require confidentiality provisions: The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. It also added a specific comment. However, this was not found in publicly available sources. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms: The Company indicates that 'The RBA, of which Canon is a member, offers a grievance mechanism called the Worker Voice Platform through which Canon's stakeholders can report specific human rights concerns'. However, no details found in relation to collaboration with state-based non-judicial mechanisms. [Sustainability report 2022, 2022: global.canon] • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided: The Company indicates in its Sustainability Report 2021 that it 'receives biannual reports from Group companies on the operational status of their respective Compliance. (...) These biannual reports from each company include not only the number of cases filed, but also a summary of each case, the results of investigation and response, and measures to prevent recurrences. Each Group company takes the necessary corrective measures and recurrence prevention measures based on the investigation results'. The 2022 report states that '21 cases were identified that needed to be addressed or resolved. For these cases, the necessary corrective action is taken along with measures to prevent recurrence'. However, no description of the specific actions it took to provide or enable a timely remedy for its victims was found. [Sustainability Report 2021, 2021: global.canon] & [Sustainability report 2022, 2022: global.canon] • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company indicates that 'In 2021, we received 103 reports related to human rights (discrimination/harassment, wages, working hours, etc.) through the internal reporting system. Of those with an investigation completed as of the end of 2021, 21 cases were identified that needed to be addressed or resolved. For these cases, the necessary corrective action is taken along with measures to prevent recurrence'. It is not clear, however, which are the outcomes for the different reporting groups (workers and external individuals and communities). [Sustainability report 2022, 2022: global.canon] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: The Company's CSR Basic Statement includes a provision to 'Pay employees wages equal to or greater than legally mandated wages'. In its Sustainability Report 2021, the Company indicates that it 'ensures that its employees are paid substantially more than the local minimum wage'. The Company discloses a table where it compares the local minimum monthly wage against the Company's standard minimum. In the US and China the ratio is 1425 and 132%, although in Japan is 107%. However, it is not clear if they have achieved paying the living wage or having a timeframe for paying a living wage for all workers. [CSR Basic Statement, 10/2021: global.canon] & [Sustainability Report 2021, 2021: global.canon] • Met: Describes how living wage determined: In its Sustainability Report, the Company indicates: 'Regarding basic salary amounts and increases as well as calculation and payment of bonuses, a committee meets with the Canon Workers' Union three or four times a year to check whether remuneration is being paid in accordance with the rules of the labor agreement'. [Sustainability Report 2020, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage: The Company states that 'in every region of the world, Canon ensure its employees are paid substantially more than the local minimum wage'. However, a table shows a range of 7% above minimum wage in Japan and over 42% in the US. It is not clear, however, if minimum ratios achieved (like 7% in Japan) are to be considered living wage in all Countries where the Company operates. • Met: Definition of living wage reviewed with unions: As indicated above, a Committee meets regularly with Workers' union to check whether remuneration is in accordance with the labour agreement. [Sustainability Report 2020, 07/2020: global.canon]
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: In its Supplier Code of Conduct, it is stated: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no evidence found of the Company indicating that it pays living wages which covers not only basic needs of employee and its family but also provides some discretionary income. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices): According to its Sustainability Report 2021: 'Canon not only complies with laws and regulations on procurement globally, but also ensures complete fairness and transparency in dealings with its suppliers. Specifically, the Canon Group Procurement Code of Conduct for Executives and Employees in Charge of Procurement stipulates appropriate actions that persons in charge of procurement as well as executives and employees responsible for placing orders should keep closely in mind in order to maintain high standards when it comes to legal compliance and corporate ethics.' The procurement policy states that 'the procurement division adopts a global perspective in purchasing quality appropriately priced merchandise in a timely manner'. However, no further information found, including about specific practices the Company implements in order to avoid price or short notice requirements or other business considerations undermining human rights. [Sustainability Report 2021, 2021: global.canon] & [Procurement Policy, N/A: global.canon] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates in its Sustainability Report 2021: Many manufacturers have outsourced assembly operations or other production processes to outside contractors; however, Canon places great importance on manufacturing, and besides product assembly, Canon manufactures certain components, parts and materials in house, at Canon Inc. production facilities or at Group manufacturing companies (collectively, "Canon production sites"). Manufacturing subsidiaries and affiliates within the Canon Group are spread across Japan, China, Taiwan, Malaysia, Thailand, the Philippines, Vietnam, the United States and Europe. They supply Canon products to Canon Inc. as well as Group marketing subsidiaries and affiliates. As the head of the Canon Group, Canon Inc. supervises Group manufacturing companies that directly employ large numbers of people. Canon production sites have partnerships with thousands of suppliers unaffiliated with the Canon Group, from whom they purchase considerable numbers of components, such as electronic parts, mechanical parts, units and materials.' However, no information indicating that it identifies all its suppliers, including indirect ones. [Sustainability Report 2021, 2021: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: Although the Company discloses information about its own major manufacturing sites in its Fact Book, no evidence found in relation to its suppliers. [Fact Book 2021/2022, 2022: global.canon] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company 'Prohibit child labor' in its CSR Basic Statement. [CSR Basic Statement, 10/2021: global.canon] • Met: Age verification of workers recruited: The Sustainability report indicates that 'Canon conducts thorough age verification at the time of employment and has guidelines in place for when an employee is found to be under the minimum working age'. [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified: Although the Company indicates that has guidelines in place for when an employee is found to be under the minimum working age, no further details were found, including how it develops, participates in or contributes to programmes for transition from employment to education, and how it improves working conditions for young workers where relevant. [Sustainability report 2022, 2022: global.canon]
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: Its Supplier Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing. [...] Participants shall implement an appropriate mechanism to verify the age of workers. [...] If child labor is identified, assistance/remediation is provided'. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with suppliers on child labour: The Company indicates that it collected letter of agreement from major suppliers confirming adherence to the RBA Code. It also indicates that 'to prevent child labor [...] we conduct yearly self-assessments using the RBA's Self-Assessment Questionnaire'. However, no specific details found on proactive work carried out to improve suppliers performance, to eliminate child labour and to improve working conditions for young workers where relevant'. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessement of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made: The Company indicates in its Sustainability Report 2020 that 'Within the scope of our 2019 survey of Canon Group companies and suppliers, no problems were found with respect to child labor or forced labor'. However there is no further information about previous years to see a trend. No new evidence found in latest review. [Sustainability Report 2020, 07/2020: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: Its Supplier Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. [...] Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with suppliers on debt & fees: Axis Communications, a subsidiary of Canon, indicates that 'Migrant workers in Malaysia and Thailand have been specifically identified as a risk area concerning compulsory/forced labor. Axis has therefore given this area special focus by undertaking additional efforts, such as conducting more frequent supplier inspections/audits and organizing more training etc., to ensure that no violation of human rights occurs'. However, it is not clear how it works with suppliers to improve their practices and eliminate any imposition of financial burdens on workers. No new evidence found in latest review. [2020 Axis Modern Slavery Act Transparency Statement, 03/2021: axis.com] Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time: The Company 'boasts one of the highest retention rates in the industry in Japan', according to the 2021 Sustainability Report. Moreover, 'Canon Inc. has introduced a position-based pay system to evaluate and compensate individuals fairly and impartially, regardless of gender or age'. Besides, 'Canon offers various employee benefit programs, covering each stage of life from hiring to retirement, enabling employees to lead comfortable and enjoyable lives'. However, no evidence found of a statement indicating that it pays workers in full an on time. [Sustainability Report 2021, 2021: global.canon] • Not Met: Payslips show any legitimate deductions: The Company 'boasts one of the highest retention rates in the industry in Japan', according to the 2021 Sustainability Report. Moreover, 'Canon Inc. has introduced a position-based pay system to evaluate and compensate individuals fairly and impartially, regardless of gender or age'. Besides, 'Canon offers various employee benefit programs, covering each stage of life from hiring to retirement, enabling employees to lead comfortable and enjoyable lives'. However, no evidence found of a statement indicating that its workers received a payslip with detailed deduction information. [Sustainability Report 2021, 2021: global.canon] Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: Its Supplier Code of Conduct requires: 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement: The Company states in its CSR Basic Statement that it 'Prohibits forced labor and unreasonable restriction of movement'. However, no further provision prohibiting documentation retaining, or other forms of movement restriction was found. 'The Company indicates that 'Canon conducts self-inspections using RBA's Self-assessment questionnaire at its domestic and overseas production sites to confirm that there is no risk of forced labor or unreasonable restrictions on movement'. Although SAQ includes personal identity documents questions, no evidence found of a formal statement of the Company indicating that it is not doing so. [CSR Basic Statement, 10/2021: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: See above. However, it is not clear if this is also applied (or a similar procedure to monitor) to employment agencies or recruitment intermediaries. [Sustainability report 2022, 2022: global.canon]
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: Its Supplier Code of Conduct indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters.[...] All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents.' [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: In its CSR Basic Statement, the Company states that it 'Respect freedom of association and the right to collective bargaining in accordance with the laws and regulations of each country and region'. However, no commitment to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) to bargain collectively found. The Sustainability report also indicates that 'we also strive to address various labor issues by promoting dialogue between labor and management. For example, the labor agreement between Canon Inc. and the Canon Workers' Union commits both sides to work in good faith to peacefully resolve issues in a timely manner'. However, as indicated it is not clear if there's a commitment to respect these rights and commitments and provide alternative mechanisms in locations where these rights are restricted under local law. [CSR Basic Statement, 10/2021: global.canon] & [Sustainability Report 2020, 07/2020: global.canon] • Met: Discloses % total direct operations covered by collective CB agreements: In its Sustainability Report 2020, the Company indicates: 'As of the end of 2019, combined employee membership in the Canon Workers' Union totalled 26,449, bringing the union membership rate to 80% for Canon Inc.'s workforce'. [Sustainability Report 2020, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: Its Supplier Code of Conduct indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company indicates in its Sustainability Report 2021: 'Canon conducts wide-ranging risk assessments to identify all operations that have a high risk of injury, illness, or accident. We take appropriate measures to mitigate risks and manage residual risks. Recognizing accidents caused by machinery as a serious risk, we regularly review existing equipment at least once a year and conduct risk assessments for new equipment at the time of installation. In 2019, we formulated a new risk assessment and management standard for all companies in the Canon Group. To ensure that the new standard is implemented properly, we are conducting training programs for health and safety staff and developing e-learning content for workplace managers and people in charge of operations to deepen their understanding of risk assessment methodology. Moreover, when a specific risk is identified, all applicable workers are notified of the risk and given needed training, and a follow-up is carried out to confirm their understanding and mastery of new work processes.' [Sustainability Report 2021, 2021: global.canon] • Not Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses information about the Numbers of Occupational Accidents and the Frequency of Occupational Accidents, however, the figures are based only in Key Group Companies in Japan. The Company indicates that it is working 'to implement an occupational safety and health management system overseas, mainly at its production bases, on the same level as in Japan'. [Sustainability Report 2021, 2021: global.canon] • Not Met: Discloses Fatalities for last reporting period • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company discloses its key occupational safety targets: 'Eliminate occupational accidents caused by machinery (0 cases); 2. Eliminate serious accidents caused by highly hazardous chemical substances (0 cases)'. However, it is not clear the targets related to rates of injury, lost days and fatalities for the reporting period. [Sustainability Report 2021, 2021: global.canon] • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: Its Supplier Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: The Company indicates that 'labor and management work hand in hand to pursue initiatives aimed at improving occupational safety and health so employees can feel safe and secure in their work environment. In line with this principle, we have established detailed rules and regulations regarding occupational safety and health (OSH), [...] Canon Inc. and Group companies in Japan have established safety and health teams at each operational site, and set targets based on the situation at each site in line with the policies of the Central Safety and Health Committee, to build healthy and safe work environments for all workers, including those of contractors. We also hold health and safety conferences with contractors to maintain and improve health and safety on site. We are applying an integrated approach across the Group's overseas production sites, while taking into consideration the specific circumstances of each region and Group company'. It also indicates that 'With increasing rates of heat stroke occurring in both indoor and outdoor worksites throughout Japan, we provide ongoing training to contract workers on heat stroke prevention. We also take preventative measures in the workplace environment'. This evidence, however, seems to refer to company employees and contractors. This subindicator looks for evidence of work conducted with suppliers and suppliers' workers. [Sustainability report 2022, 2022: global.canon] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to stop harassment and violence against women: The Company 'maintains a zero-tolerance policy on harassment, which it communicates to all management executives and employees. In addition to sexual harassment and power harassment, Canon Inc.'s employment rules and Harassment Prevention Provisions prohibit other forms of harassment, including maternity harassment. These provisions have been disseminated throughout Canon Group companies in Japan, and many have instituted similar rules based on them. Furthermore, following a revision to the law in 2020, we will review the rules as necessary. (...) Regular liaison meetings are held for persons responsible at Canon Inc. operational sites and Group companies in Japan, enabling the operational status of hotlines to be monitored and shared. Reviews of procedure manuals are conducted at such meetings, and guidance on how to respond to reports of harassment is also provided'. Moreover, 'we periodically conduct awareness surveys with employees working at Canon Inc., Group companies in Japan and major overseas sales companies. The results are reported to executives and are also shared with employees through the company intranet and other tools. If there are any topics deemed to be problematic, necessary actions will be taken to further improve our corporate ethics'. The Company also has a Harassment Hotline, for its Canon Inc. and its many Group companies in Japan. [Respecting Human Rights, N/A: global.canon] • Not Met: Working conditions take account of gender: The Company indicates in its Sustainability Report 2021 that: 'To enable employees to focus on childcare responsibilities with peace of mind, Canon Inc. offers an array of programs that go beyond the legally stipulated minimum requirements, including a childcare leave program that enables employees to take leave until their child reaches the age of three, and a system for reducing work hours to support childcare, making it possible for employees to reduce their workday by up to two hours until their child has finished the third grade of primary school. [...] We provide various support systems that go beyond the legally stipulated minimum requirements, including nursing care leave available for up to one year, sympathy money, and a system for reduced work hours to support nursing care, enabling employees to reduce their workday by up to two hours a day'. Moreover, 'the company is aiming to achieve a ratio of 33% for women in management by 2022 with measures such as working hours adjustment for pregnant workers and improved conditions for women returning from maternity leave.' In addition, in its Sustainability Report 2019, the Company stated: 'Meanwhile, at Canon Vietnam, steps have been taken to alleviate the burden on pregnant workers by setting up production lines where people can work while seated'. However, no further details found of measures that take into account particular hazards for women, specially concerning reproductive health, beyond the case of Vietnam. [Sustainability Report 2021, 2021: global.canon] & [Sustainability Report 2019, 05/2019: global.canon] • Not Met: Measures and steps to address gender pay gap at all levels of employment

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap: Although the Company provides figures of 'base salary and total salary per employee by gender' for both management and non-management employee for the last reporting year in each report (2022 report and 2021 report), no evidence found of a direct comparison made by the Company. This subindicator looks for either an explanation of the trend, or the provision a trend showed in the same table. Readers are not expected to collect evidence from different reports and do a manual comparison (as it is not clear if comparison would be adequate considering potential changes in measures procedures, scope of the information, etc.) [Sustainability report 2022, 2022: global.canon] & [Sustainability Report 2021, 2021: global.canon]
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: Its Supplier Code of Conduct indicates: 'Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on (...), gender, sexual orientation, gender identity and expression (...) in hiring and employment practices such as wages, promotions, rewards, and access to training'. Also, 'there is to be no harsh and 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'. The supplier code also requires that 'Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers. However, no requirement to suppliers to provide pay equal pay for equal work, and to have measures to ensure equal opportunities throughout all levels of employment. [Supplier Code of Conduct, 01/2021: global.canon] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: Although the CSR Basic Statement indicates as a Company's principle to 'Prevent excessive overtime work and grant appropriate holidays', there is no explicit commitment to respect maximum hours and minimum breaks. Moreover, in its 2021 Sustainability Report, the Company explains that it 'works diligently to ensure that employee work hours comply with the laws of each country and region where it operates, targeting reductions in hours where appropriate'. The Sustainability report 2022 states that 'Canon works diligently to ensure that employee work hours comply with the laws of each country and region where it operates, targeting reductions in hours where appropriate. For example, at Canon Inc., we encourage workplaces to ban overtime in principle and to review work practices. In addition to an open vacation program in which employees can take five consecutive days of vacation once per year, starting in 2019, we have been encouraging the taking of paid leave in various ways, such as having employees submit a plan for taking five or more days of annual vacation at their first meeting with their supervisor in the new year. Average paid leave taken in 2021 was 16.4 days. Total hours worked per employee were 1,745, a 54-hour decrease from 2010 (1,799 hours), when activities to reduce total working hours began. However, although it states that it works to comply with the law of each country, it is not clear it respects applicable international standards and national laws and regulations concerning maximum hours (and not going over 48 hours for regular working weeks). [CSR Basic Statement, 10/2021: global.canon] & [Sustainability Report 2021, 2021: global.canon] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: How it implements and checks this in its operations: On its website, the Company indicates that it 'works diligently to ensure that employee work hours comply with the laws of each country and region where it operates, targeting reductions in hours where appropriate. For example, at Canon Inc., we encourage workplaces to ban overtime in principle and to review work practices. In addition to an open vacation program in which employees can take five consecutive days of vacation once per year, starting in 2019, we have been encouraging the taking of paid leave in various ways, such as having employees submit a plan for taking five or more days of annual vacation at their first meeting with their supervisor in the new year. Average paid leave taken in 2020 was 16.4days. Total hours worked per employee were 1,720, a 79-hour decrease from 2010 (1,799 hours), when activities to reduce total working hours began'. [Hiring and Treatment of Human Resources, N/A: global.canon]
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Working hours in codes or contracts: Its Supplier Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to international standards and national laws or standard weekly hours not going over 48 hours. [Supplier Code of Conduct, 01/2021: global.canon] Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of number affected by excessive working hours Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Due diligence in accordance with OECD Guidance in supplier contracts: Its Supplier Code of Conduct requires: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. In addition, the Conflict Mineral Report 2020 states: 'Canon requested the first-tier suppliers to sign and submit written confirmation ("Certificate of Consent") of their agreement and cooperation with Canon's "Canon Group Basic Policy on Responsible Minerals Sourcing" and their agreement to take an action for appropriate measures should any significant risks associated with mineral sourcing be found in the supply chain.' Its Basic Policy on Responsible Minerals Sourcing reads: 'By cooperating with surveys and audits conducted by Canon Group companies as well as with the elimination of uncovered risk, we expect our business partners, as members of global supply chain, to join the Canon Group in carrying out the responsible sourcing of necessary minerals in the interest of ensuring the safe and secure supply of products'. [Supplier Code of Conduct, 01/2021: global.canon] & [Conflict Minerals Report 2020, 2021: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Works with smelters/refiners and suppliers to build capacity: According to its Conflict Mineral Report 2019, the Company 'along with the other companies in the RMTWG, played an active role in sending letters to SORs encouraging them to join the RMI's RMAP or to check if the SORs have so-called Annex II risks of the OECD Guidance or the U.S. sanction risks based on the U.S. Office of Foreign Assets Control (OFAC)'. The sustainability report 2022 indicates that 'In Japan, Canon is active as a leading member of the Responsible Minerals Trade Working Group (RMTWG) of the Japan Electronics and Information Technology Industries Association (JEITA). Canon is also a member of the Conflict Free Sourcing Working Group (CFSWG), which cooperates with JEITA and leading Japanese automakers'. It also states that 'Canon takes steps to gain the understanding of suppliers and seek their cooperation with mineral sourcing investigations. This includes compiling a guidance manual on related procedures. Furthermore, Canon established a page entitled "Procedure for the Submission of Concerns Regarding Mineral Risk" on its official website in 2015. Parties with specific concerns and/or information regarding circumstances of extraction, trade, handling and export of minerals (tantalum, tin, gold and tungsten) in conflict-affected and high-risk areas as they pertain to Canon product supply chains (such as facts indicating that those minerals are the source of funds for armed groups in conflict-affected areas and human rights violations) can contact Canon through this page.' However, it is not clear if it carries out capacity building activities with smelters and refiners as well. [Form SD 2019, 28/05/2020: global.canon] & [Sustainability report 2022, 2022: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: The Company indicates in its Conflict Mineral Report 2020: 'Canon requested the first-tier suppliers to sign and submit written confirmation ("Certificate of Consent") of their agreement and cooperation with Canon's "Canon Group Basic Policy on Responsible Minerals Sourcing" and their agreement to take an action for appropriate measures should any significant risks associated with mineral sourcing be found in the supply chain'. Its Basic Policy on Responsible Minerals Sourcing reads: 'By cooperating with surveys and audits conducted by Canon Group companies as well as with the elimination of uncovered risk, we expect our business partners, as members of global supply chain, to join the Canon Group in carrying out the responsible sourcing of necessary minerals in the interest of ensuring the safe and secure supply of products'. [Conflict Minerals Report 2020, 2021: global.canon] & [Basic Policy on Responsible Minerals Sourcing, N/A: global.canon] • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Risk identification and disclosure in line with OECD Guidance: As described below, the Company identifies smelters and refiners in the supply chain and also identified those conformant to RMAP See below further details. The sustainability report states that 'mineral mining sites, smelters or other processing sites for some of those materials have been shown to have links to armed groups, serious human rights violations or environmental destruction'. Procurement of conflict minerals is considered by the company as a salient issue that can affect local communities. Finally, it also adds that 'recent years have seen heightened worldwide attention given to the procurement risk associated also with non-3TG mineral substances. Specifically, cobalt - in growing demand for its use in lithium-ion batteries and other applications - is the focus of concern over potential human rights violations, including child labor, at mining locations'. [Conflict Minerals Report 2020, 2021: global.canon] & [Sustainability report 2022, 2022: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identification of smelter/refiners and OECD Guidance: In the Conflict Mineral Report, the Company indicates that the process to identify smelters/refiners include the following: '[...] designed a framework to identify each of the parts and materials used in the products that it manufactured or contracted to manufacture. [...] Canon then carried out the RCOI on the first-tier suppliers handling the identified parts and materials. For the RCOI, Canon used the RMI Conflict Minerals Reporting Template ("CMRT"). [...] Canon requested the 3,328 first-tier suppliers that were identified as possibly using 3TG to report their status of 3TG using the CMRT. [...] Canon conducted due diligence examinations of first-tier suppliers that reported the use of 3TG originating from covered countries. Canon requested replies from the first-tier suppliers who did not respond by the closing date of the response. Canon Inc. verified the replies submitted by first-tier suppliers (for any incomplete answers or errors) using a proprietary reply-processing tool. When necessary, Canon requested resubmissions from first-tier suppliers. [...] Canon compared the smelters or refiners ("SORs") identified through the RCOI against the list of the SORs which have been validated to be conformant to the Responsible Minerals Assurance Process ("RMAP"), the audit program of the RMI, as published by the RMI.' [Form SD 2019, 28/05/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses a 'List of the SORs identified in Canon's supply chain which are RMAP conformant' in its Conflict Mineral Report 2019. [Form SD 2019, 28/05/2020: global.canon] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Disclose better risk prevention/mitigation over time • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to security of persons • Headline: Apple and others named as supplier North Mara Gold Mine faces allegations of pollution and violence in Tanzania • Story: On June 18th, 2019, news outlets in several countries simultaneously released the results of investigations by a consortium of journalists, Forbidden Stories, into human rights and environmental abuses at Barrick Gold's North Mara gold mine in Tanzania, confirming six years of investigations, reported on yearly by MiningWatch Canada, into assaults on men, women and children by the mine's private security and by police contracted by the mine. There have been injury cases including loss of limbs, loss of eyesight, broken bones, and internal injuries. Additionally, the consortium highlighted attacks on journalists who have tried to report on human rights abuses at the mine. At least a dozen local and foreign reporters were censored or threatened, and this is why Forbidden Stories has decided to investigate Acacia Mining's activity in the mine. The consortium also exposed how the gold from this mine is refined in India and Switzerland before being sold to, among others, international electronic companies. In June 2019, at the annual shareholders meeting, human rights campaigners called for independent and transparent assessment of grievance claims and an end to the memorandum of understanding with police. [Ghana Business News, 20/06/2019, "Dirty secrets of mining echo on three continents": ghanabusinessnews.com] [Ghana Business News, 19/06/2019, "Green Blood: A Tanzanian gold mine that silences journalists": ghanabusinessnews.com] [The Guardian, 18/06/2019, "Tech firms to check suppliers after mining revelations in Tanzania": theguardian.com]
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: According to the press, a spokesperson for the Company stated 'We are not aware of any relationship between human rights abuse mining in Tanzania and MMTC-PAMP India. We will carefully review your report after it is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>published and then consult with the RMI (of which Canon is a member) to take appropriate steps as necessary'. [The Guardian, 18/07/2019: theguardian.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response does not address the details of the alleged rights violations.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Following the publication of the allegation, Apple, Nokia and Canon said they would ask MMTC-PAMP to look into the claims, and the refinery announced it would assess its gold supply chain from Tanzania and arrange for a site visit by an independent expert, Synergy Global Consulting Ltd. <p>The visit took place on 19-21 November 2019, however, the visitors were allowed to talk only to local residents vetted by the mine. Furthermore, "the mine said there was a security issue offsite so we suggested some victims go to mine office and speak to the assessor there. Then they said there was not enough time in the schedule. So the assessor spoke to none of the human rights victims, [or] lawyers of victims"</p> <p>According to the auditor, they had "spoken to a variety of stakeholders, including local community representatives. Following the trip [...] there was also an interview with an international NGO." In a response to Raid the auditor admitted that there had been no engagement with affected stakeholders.</p> <p>Barrick Gold, the company operating the mine, claims it has been conducting stakeholder and community engagement since taking over the operations. However, this claim does not expressly include the engagement with affected stakeholders. [The Guardian, 13/07/2020, "Gold trade body urged to suspend refinery over alleged abuses in Tanzania": theguardian.com] [Synergy, 10/07/2020, "Response to RAID article "LBMA Should Suspend Gold Refiner MMTC-PAMP"": media.business-humanrights.org] [Barrick, 10/08/2020, "Solid Operating Performance Maintains Production Within Guidance": barrick.com] [Barrick, N/A, "Human Rights Report": s25.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The executive summary of the auditor's report included no evaluation of historical claims. Instead the summary said the focus of the assessment was to look forwards rather than backwards because a new management team had been put in place at the mine. Therefore, the summary does not identify the underlying causes of the impacts. Even though the auditor told The Guardian that the full report "would include a review of historical allegations against the mine based largely on third-party information, such as newspaper articles and evidence collected by civil society groups and lawyers" the CHRb could not access the full report to verify these claims. <p>Barrick Gold also states that the violations took place under the management of the previous operator and does not present an analysis of underlying causes. [The Guardian 13/07/2020: theguardian.com] [Synergy, 05/2020, "MMTC-PAMP North Mara Gold Mine Assessment - Executive Summary": mmtcpamp.com] [Barrick, 10/08/2020: barrick.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company indicated it would take appropriate steps as necessary, however, the CHRb could not find any information to verify this claim. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy [Raid, 07/2020, "Analysis of synergy assessment north mara gold mine update": raid-uk.org] [Raid, 16/12/2021; "Will Barrick Gold's CEO go beyond rhetoric to deliver justice for victims of police killings at Tanzania mine?": raid-uk.org] [Responsible Mining Fpundation, 14/08/2020, "More Tnaznian human rights victims join UK legal action against Barrick": responsibleminingfoundation.org] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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