



KONICA MINOLTA

## WHISTLEBLOWING POLICY

A whistleblowing policy has been established to formalize the whistleblowing mechanisms to encourage the reporting of matters of serious concern that may affect the business operations and reputation of Konica Minolta Business Solutions (HK) Ltd. ("Konica Minolta"). This whistleblowing policy details the reporting channels and mechanisms to enable Konica Minolta to take appropriate action in a timely and ethical manner. The policy may be enhanced to provide you more details in due course.

### **Whistleblowing channels:**

To facilitate the investigations of matters of serious concern, please provide the following information by sending Konica Minolta an email to [bhk.whistleblowing@gcp.konicaminolta.com](mailto:bhk.whistleblowing@gcp.konicaminolta.com):

- Information / identity of the suspect;
- Misconduct / improper activity occurred;
- When the matter happened and when you noticed it;
- Where it happened;
- Other parties involved other than the suspect stated above, if any; and
- Witness, if any, name, title, tel. no and email address.

You have an option to remain anonymous, though this is not preferred.

### **What should be reported or disclosed:**

Examples of matters that should be reported, including but not limited to:

- Criminal offence, e.g. fraudulent activities;
- Failure to comply with any legal or regulatory obligation;
- Health and safety of any individuals being put at risk;
- In breach of code of conduct, and any other matters such as racial discrimination or sexual harassment;
- Financial irregularity; or
- Deliberate concealment relating to any of the above.

### **Investigation:**

The matters giving rise to serious concern should be reported in writing, and supported by documentation if possible. It would be more effective for us to investigate and resolve the matters if there are written documents and/or your identity is made known to us. Appropriate feedback should be given to the whistleblowers who reported the matters, if they have identified themselves.

The principle of whistleblowing is to protect and support anyone who reports genuine (non-malicious or vexatious) matters of concern. However, it is inevitable that there are circumstances that result in legal or criminal proceedings, relevant authorities would require the disclosure of the identity of the person who reports the matters ("reporter"); or it is possible that the information provided would eventually reveal the identity of the reporter.

### **Legal obligations:**

This whistleblowing mechanism does not affect the rights or obligations of any whistleblowers to report a criminal matter or other matters requiring disclosure to a party as may be required by law.



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## 舉報政策

為釐清舉報機制以鼓勵舉報有可能影響柯尼卡美能達商業系統(香港)有限公司(“BHK”)的業務營運和聲譽的問題，BHK 現建立舉報政策。此舉報政策說明了舉報渠道和程序，讓 BHK 能夠及時採取適當及合乎道德的行動。該政策會定期更新，為您提供更多詳細信息。

### 舉報渠道：

為有助對事件進行調查，請通過電郵 [bhk.whistleblowing@gcp.konicaminolta.com](mailto:bhk.whistleblowing@gcp.konicaminolta.com) 向 BHK 提供以下資料：

- 被嫌疑者的資料/身份；
- 行為不當詳情；
- 事件發生的時間和您注意到的時間；
- 發生的地方；
- 上述被嫌疑人以外的其他有關人士（如有）；及
- 證人(如有)，並提供姓名，職業，電話，電郵地址。

您可以以匿名方式舉報，縱使這不是建議的方式。

### 應該舉報或披露的內容：

應舉報的事例，包括但不限於：

- 刑事犯罪，例如欺詐活動；
- 未能遵守任何法律或法規；
- 任何導致個人危險或健康和 safety 問題；
- 違反操守守則，如有關種族歧視或性騷擾；
- 財務違規；或
- 故意隱瞞與上述任何相關的內容。

### 調查：

舉報或披露應以書面形式報告，並盡可能提供支持文件。書面文件和/或清楚表明您的身份，會有效地幫助我們的調查和解決工作，及從而向舉報人士提供適當的反饋。

舉報政策的原則是保護和支持舉報真實（非惡意或無理）問題的人士。但在某些情況下問題會牽涉到法律或刑事訴訟，有關（法律／政府）機構會要求披露該舉報人士的身份；或者所舉報事項的內容有可能最終揭示舉報人士的身份。

### 法律權利：

本舉報機制不影響任何人士根據法律要求向外舉報刑事案件或其他需要披露的事項的權利。