

KONICA MINOLTA

Giving Shape to Ideas



Supplier Code of Conduct

September 2021

I see the beauty of people and the human soul in the pictures I take. Although the circumstances of some of the people I portray may be grim, back-breaking, or even depraved, the people themselves are always remarkable characters and have extraordinary souls.

– GMB AKASH

The photographs used throughout this document are the work of Bangladeshi photographer, GMB Akash. Akash, a dedicated human rights photographer and advocate, has been working for more than a decade to capture the spirit of 'survivors' in some of Bangladesh's darkest corners. His images, which strike a delicate balance of beautiful strength amidst human suffering, capture situations of poverty, exploitation, child labour and environmental degradation.

By using Akash's images to tell a story, we hope to raise awareness about the reality of work life for millions around the world. Profits from the sale of Akash's book, *Survivors*, are invested in livelihood projects to support those photographed. All images of children are taken with informed consent.

www.gmb-akash.com

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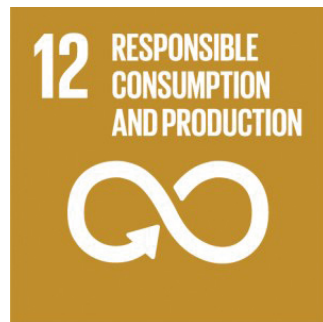
Introduction

Konica Minolta Business Solutions Australia (“Konica Minolta”) recognises that our supply chain activities can have wide ranging impacts and that our responsibility extends beyond our own operations and into our supply chain. We are committed to socially and environmentally responsible procurement and have set high standards for the way we do business so our customers know we can be trusted.

In the event that Australian or, where different local, law, regulation, rules or contract conditions impose stricter requirements than this Code, suppliers (and their supply chains) must comply with those requirements. Where our standards go further than local laws, we will adhere to our standards in a way that is appropriate.

Alignment to the SDGs

The United Nations Sustainable Development Goals (SDGs) invite action from the private sector to address some of the world’s most pressing development issues. Situated in a broader ethical sourcing framework, our Supplier Code of Conduct is one way Konica Minolta aligns with the SDGs. By managing actual and potential human rights and environmental risks in our supply chain we are, in a small way, contributing towards SDG 8 on decent work and economic growth, and SDG 12 on responsible consumption and production.



Purpose and scope

Our Supplier Code of Conduct (“Code”) sets out the minimum standards of behaviour we require of our suppliers. It is based on the Electronic Industry Citizenship Coalition (EICC) Code of Conduct, which has been adapted to our local operating context.

The Code is applicable to all contract suppliers who are expected to cascade these requirements to their own supply chain. We ask our suppliers to not just comply with the Code, but to use reasonable endeavours to exceed it and promote continual improvement throughout their business operations.

Commitment

We are committed to implementing our Supplier Code of Conduct to ensure that the people and environment impacted by our business operations are treated with respect. In living our value as a company that cares, it is our responsibility to do business ethically, which extends to human rights in our supply chains. This is a valuable opportunity to influence, educate and work with our supplier base, ensuring transactions are both transparent and fair. We look forward to engaging with suppliers that are aligned to our values and cascading best practice throughout our supply chain.

Yohei Konaka

Chairman & Managing Director
Konica Minolta Business Solutions Australia

People

Suppliers shall be committed to uphold 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.

All suppliers must comply with applicable international and national laws and standards in relation to labour practices and human rights.

▀ Voluntary Employment

Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour: slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force coercion, abduction or fraud for the purpose of labour or service. There shall be no unreasonable restrictions on workers' freedom of movement including unreasonable restrictions on entering or exiting company-provided facilities. All work must be voluntary, and employees shall be free to terminate their employment in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.

▀ Child Labour & Young Workers

a) The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the supply chain.

b) Young Workers, those under 18 years of age, shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Work shall not interfere with their education or be harmful to their mental, social or moral development.

▀ Working Hours

Working hours are not to exceed the maximum set by law, workers shall not be required to work more than 60 hours per 7-day week, including overtime, except in extraordinary business circumstances, where it is allowed by national law, is in a freely negotiated collective agreement and where appropriate safety safeguards are in place. Workers shall be allowed at least one day off every seven days. Overtime shall be compensated at the prevailing overtime rates.

▀ Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime



hours and legally mandated benefits. In compliance with local laws workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

Other deductions for accommodation, meals, transport, or personal protective equipment should not exceed minimum costs.

▀ Humane Treatment

There is to be no harsh or 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. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

▀ Freedom of Association and Collective Bargaining

Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers shall recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice. Suppliers must also respect any legal right of workers to bargain collectively.

▀ Labour Hire

Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

If any such fees are found to have been paid by workers, they must be repaid within 90 days.

As part of the hiring process, migrant workers specifically recruited overseas must be provided with a written

employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin.

Particular attention should be given to the recruitment and treatment of at risk groups, notably migrant workers, refugees and asylum seekers.

▀ Anti-discrimination

Suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices such as promotions, rewards and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or prospective workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way. Parental and carers leave should be provided for, at a minimum as required by national law.

▀ Equality, Diversity and Community

Suppliers shall promote a culture of enabling a supply chain that includes equality, diversity and actively support programs that look to ensure a diverse worker base.

Konica Minolta will continue to, where possible, pursue a strategy of supplier diversity embodying Indigenous procurement, and deepen existing engagement through our Supply Nation membership.

More broadly, Konica Minolta has genuine commitment to community engagement across a number of sectors including health, education, the environment and human rights. We seek to engage suppliers that share a passion for creating positive outcomes for local and international communities.

Health and safety

Every employee has the right to work in a safe and healthy work environment. A safe and healthy work environment also enhances operational performance, increase morale and contributes to employee retention.

All suppliers must make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations. Suppliers must comply with applicable international and national laws and standards in relation to health and safety management.

Occupational Safety

Suppliers are required to ensure worker exposure to potential health and safety hazards are controlled in the following order: a) elimination; b) substitution; c) engineering controls; d) administration controls; and e) personal protective equipment. This includes production and other machinery evaluated for safety hazards, as well as worker exposure to chemical and biological agents.

Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking of occupational injury or illness. Procedures must encourage worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.

Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.

Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimising harm to life, the environment and property.

Welfare

Suppliers shall keep their workplace at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites shall be adequately clean and hygienic and have sanitary food, preparation, storage and eating facilities. There shall be clean drinking water, clean toilet and washing facilities.

Communication & Training

Suppliers shall provide workers with appropriate and regular workplace health and safety related information and training, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs, in the primary language of the workers, shall be displayed on relevant equipment and hazardous or toxic substances or objects.



Environmental

We recognise that sustainable economic development is dependent upon environmental protection. As such we are committed to continual improvement in our performance, efficient use of natural resources and to innovate to solve increasingly urgent environment issues.

All suppliers must comply with applicable international and national laws and standards in relation to environmental management. Suppliers should consider a lifecycle approach to minimise the environmental impact of its products and services from creation to disposal.

▀ Environmental Permits and Reporting

All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

▀ Pollution Prevention and Resource Reduction

Suppliers are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.

▀ Hazardous Materials

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

▀ Waste Management

Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

Wastewater generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.

▀ Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.

▀ Packaging and Paper

Supplier shall avoid undue and unnecessary use of material and use recycled materials whenever appropriate. We are a member of the Australian Packaging Covenant and encourage suppliers to consider an action plan for their business.

▀ Product Content Restrictions

Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

▀ Energy Consumption and Net Zero Emissions

Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption, including switching to renewable energy sources and pursue efforts to minimise emissions.



Business ethics

Konica Minolta expects the highest standards of ethical conduct in all of its endeavours. Suppliers are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

Business Integrity

Konica Minolta promotes integrity and ethics in all aspects of its activities and does not tolerate any form of corruption, extortion or embezzlement. Suppliers must have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). Suppliers must never make or approve an illegal payment to anyone under any circumstances.

No Improper Advantage

Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to Konica Minolta staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Disclosure of Information

Suppliers shall disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance in accordance with the applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

Conflict of Interest

Suppliers must make Konica Minolta aware of any actual or potential conflicts of interest that are relevant to Konica Minolta's business. For example, the supplier shall declare if it believes one of Konica Minolta employees or contractors has an interest or economic tie to the supplier's organisation.

Intellectual Property

Suppliers shall understand their role as custodians of customer information. Intellectual property rights must be respected, and all use of technology, information and know-how shall be conducted in a manner which does not endanger the intellectual property of Konica Minolta.

Fair Business, Advertising and Competition

Suppliers shall uphold standards of fair trading (in accordance with the meaning defined by World Fair Trade Organisation), advertising and competition. Means to safeguard customer information should be available.

Data Protection and Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information obtained from those they do business with, including suppliers, customers, consumers and employees. Suppliers must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers shall not use or disclose any information belonging to Konica Minolta, its existing and prospective customers, other suppliers, employees and other third parties, except as required or authorised in writing by Konica Minolta.

Protection of Identity and Non-retaliation

Suppliers shall maintain programs that ensure the confidentiality and protection of supplier and employee whistle-blowing. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Responsible Sourcing of Material

Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to Konica Minolta on request. Suppliers that manufacture, or where their main business is trading, electronic products must have a policy to reasonably assure that the tantalum, tin, tungsten and gold (known as 'conflict minerals') in the products does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

Compliance

Suppliers must comply with all applicable local laws and regulations, both in letter and spirit, in all the countries in which they operate. Where this Code goes further than local standards, suppliers must adhere to the Code in a way that is appropriate.

Management system

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code.

The management system should contain the following elements:

Commitment to Continuous Improvement

A corporate social and environmental responsibility policy statement affirming the Supplier's commitment to compliance and continual improvement.

This should be endorsed by executive management and made available to all employees.

Management Accountability and Responsibility

Suppliers shall clearly identify their representative[s] responsible for ensuring implementation of the management systems and associated programs. The identified person shall actively, transparently and collaboratively communicate with Konica Minolta's representative.

Legal and Customer Requirements

Suppliers shall identify, monitor and understand applicable laws, regulations and customer requirements regarding corporate responsibility. This includes abiding by any local Modern Slavery laws that apply to the jurisdiction in which you operate.

Adequate documentation and records to evidence regulatory compliance and license to operate shall be in place.

Improvement Objectives

Suppliers shall develop written performance objectives, targets and implementation plans to improve their social and environmental performance including a periodic assessment of suppliers performance in achieving those objectives.

Risk Assessment and Risk Management

Suppliers shall develop and implement processes to identify the environmental, health and safety and labour practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and regulatory requirements.

Training and Communication

There shall be programmes for communication with and training of managers and workers regarding policies, procedures and improvement objectives designed to meet applicable legal, regulatory and client requirements.

Worker Feedback and Participation

Suppliers shall set in place an anonymous feedback mechanism. Programs shall be in place to ensure the protection of confidentiality and obstruction of retaliation regarding whistle blowing made in good faith.

Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

Supplier's Responsibility

As a supplier of Konica Minolta, the supplier's role begins, but does not end, with understanding the Code. Suppliers should develop process to communicate the Code requirements to its own suppliers and to monitor those suppliers compliance to the Code. If any ethical or legal compliance issues arise that raise any questions, the suppliers have the responsibility to bring them forward.

“Human rights due diligence can be included within broader enterprise risk management systems, provided that it goes beyond simply identifying and managing material risks to the company itself, to include risks to rights-holders.”

Commentary to UN Guiding Principles on Business and Human Rights, pg. 18.

Governance

Konica Minolta may verify the compliance of all its direct suppliers with the Code. Such verification will be conducted by way of a supplier self-evaluation or, where agreed, an audit by Konica Minolta (or an external resource designated by Konica Minolta) who may visit the supplier's facilities with appropriate notice.

Compliance with the principles contained in the Code is a criteria that will be taken into consideration in Konica Minolta's supplier selection process.

Whenever a situation of non-compliance is identified or a supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the relevant representative of Konica Minolta. As a preferred course of action, Konica Minolta commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-conformance, Konica Minolta will regard such conduct as a serious failure to adhere to this Code of Conduct and reserves its rights accordingly.

To raise a concern, the supplier can send an email to: ethical.supply@konicaminolta.com.au

Konica Minolta will ensure that all raised compliance issues in the Code are resolved quickly, fairly and at the proper level in Konica Minolta.

Disclosures related to incidents of modern slavery related to the company's activities or suppliers may be reported to the whistleblower hotline. Reports to the reporting service may be made on a strictly anonymous basis. For individuals who avail themselves of this service and do not wish to remain anonymous, every effort will be made to keep the report confidential, subject to the need to conduct an adequate investigation.

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

Main references

Universal Declaration of Human Rights
www.un.org/Overview/rights.html

ILO International Labour Standards
www.ilo.org/public/english/standards/norm/whatare/fundam/index.html

ISO14001:2004
www.iso.org

UN Guiding Principles on Business and Human Rights
http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

SA 8000:2014
<http://www.sa-intl.org/>

OECD Guidelines for Multinational Enterprises
www.oecd.org

United Nations Convention against Corruption
<http://www.unodc.org/unodc/en/treaties/CAC/index.html>

United Nations Global Compact
www.unglobalcompact.org

Electronic Industry Citizenship Coalition
<http://www.eiccoalition.org/standards/code-of-conduct/>

Related documents

Code of Conduct Purchasing Policy
Non-Stock Conflict of Interest Policy
Fraud and Corruption Policy
Modern Slavery and Ethical Sourcing Policy
Whistleblower Policy
Anti-Harassment Discrimination and Bullying Policy
Health, Safety and Environment Policy
Human Rights Position Statement
Ethical Sourcing Roadmap

More information

If you have any other questions, or would like any more information,
please contact us care of:

Ethical Supply Chain Management

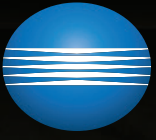
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