



KONICA MINOLTA

Konica Minolta Group Guidance for Charter of Corporate Behavior

January, 2016 (ver._2.0)

KONICA MINOLTA GROUP CHARTER OF CORPORATE BEHAVIOR

Corporations, in addition to being economic entities engaged in the pursuit of profit through fair competition, should be beneficial to society at large. For this reason, Konica Minolta Group shall behave in a socially responsible manner and shall have all of its directors, officers and employees clearly acknowledge the spirit of this Charter of Corporate Behavior.

Senior management shall recognize that the fulfillment of the spirit of this Charter is its own role and responsibility, and shall take the initiative to ensure that all directors, officers and employees fully understand the Charter. In addition, the management shall constantly pay attention to the opinions of internal and external parties and shall promote the implementation of effective systems to secure ethical corporate behavior.

1. Beneficial and Safe Products

We shall strive to earn the confidence of consumers and customers through the development and provision of socially beneficial products and services with the utmost consideration for safety.

2. Fair and Transparent Corporate Activities

We shall, in the pursuit of fair and transparent corporate activities, comply with laws and social regulations and act in accordance with international rules and the articles of incorporation.

3. Communications with Society and Information Disclosure

We shall communicate with society at large and disclose corporate information fairly and adequately.

4. Environmental Protection

We shall acknowledge the seriousness of global environmental issues and shall act voluntarily and affirmatively to protect the environment.

5. Contribution to Society

We shall, with a global perspective, affirmatively make contributions to society while respecting local customs and cultures.

6. Respect for Employees

We shall endeavor to make the lives of employees comfortable and fulfilling, provide a safe work environment and respect each employee's personality and individuality.

7. Responsible Actions

In the event of a violation of the principles of this Charter, in order to solve the problem senior management shall investigate the cause of the violation and develop reforms to prevent its recurrence in accordance with corporate compliance procedures. Prompt public disclosure of precise information and an explanation regarding the violation shall be made and responsibility for the violation shall be clarified. Strict and fair disciplinary action shall be taken, including with respect to senior management, where necessary.

Established on October 1, 2003

Guidance for Charter of Corporate Behavior

This “Guidance for Charter of Corporate Behavior” (“Guidance”) has been made in order to enable every employee in our Group to refer it when he or she put the Konica Minolta Group Charter of Corporate Behavior (“Charter”) in practice.

Since our Charter is a globally-common standard throughout the Group, in the Guidance preferred day-to-day course of action is enumerated for each section of the Charter so that every employee of the Group over the world may have a common understanding and put the Charter in practice. In addition, at the end of the Guidance, the full text of some existing Group-wide policies were listed, which are referred to in the relevant sections of the Charter. Every employee is expected to put the Charter referring to this Guidance in practice.



1 ■ Beneficial and Safe Products

We shall strive to earn the confidence of consumers and customers through the development and provision of socially beneficial products and services with the utmost consideration for safety.

- 1-1 We shall develop and provide socially beneficial products and services to meet the needs of consumers and customers and contribute to sustainable development of society.
- 1-2 We shall provide safe products and services that satisfy both the public safety standards of each country and our own internal safety standards through continuous quality improvement.
- 1-3 We shall provide consumers and customers with appropriate information about our products and services.
- 1-4 We shall respond to inquiries from

consumers and customers in good faith and improve and develop our products and services in light of these inquiries.

- 1-5 If there is a risk of an accident or inconvenience with respect to our products or services that may affect the safety of consumers and customers, we shall take prompt and appropriate action to prevent the occurrence or spread of such accident or inconvenience.

- 1-6 If any accident or inconvenience with respect to our products or services occurs, we shall take prompt and appropriate action.

<Refer to *1 “Konica Minolta Quality Policy”>



2 ■ Fair and Transparent Corporate Activities

We shall, in the pursuit of fair and transparent corporate activities, comply with laws and social regulations and act in accordance with international rules and the articles of incorporation.

- 2-1 We shall comply with all applicable laws whether they are local, national or international.
- 2-2 We shall respect every kind of social regulations including the Ten Principles of the United Nations Global Compact and the Universal Declaration of Human Rights.
<Refer to *2 “Ten Principles of the United Nations Global Compact”>
- 2-3 We shall comply with all applicable anti-trust and competition laws in each country and area, and conduct fair, transparent and trade.
- 2-4 We shall establish the Konica Minolta Procurement Policy to maintain fairness and transparency in our procurement activities.
<Refer to *3 “Konica Minolta Procurement Policy”>
- 2-5 We shall voluntarily refrain from business entertainment outside the bounds of social common sense or international customary practice.
- 2-6 We shall NOT solicit or accept gifts, benefits or business entertainment beyond social common sense or international customary practice.
- 2-7 We shall NOT participate in any illegal or unfair (fraudulent) transaction even if requested by a customer or supplier.
- 2-8 We shall voluntarily refrain from providing any personal investment or personal loan to suppliers or customers. Purchase of publicly traded stock is not prohibited. (Reference to 2-11)
- 2-9 We shall NOT make or pay any bribe or illegal political contribution in any country.
- 2-10 We shall comply with all applicable export

- control laws and internal policies or regulations in order to maintain international peace and security. If there’s a possibility that any goods (products, parts, equipment, etc.) or technology (technical information, software, etc.) to be exported could be used for development or manufacture of weapons of mass destruction or for terrorist activities, we shall NOT make the transactions.
- 2-11 We shall NOT place a purchase or sale order for any publicly traded stock of a company when we have knowledge of inside information of a material nature concerning said company that has not been disclosed to the public.
- 2-12 We shall acknowledge the value of confidential information of our group and third parties, and shall keep such information confidential.
- 2-13 We shall establish the Konica Minolta Information Security Policy to remain dedicated to maintaining information security.
<Refer to *4 “Konica Minolta Information Security Policy”>
- 2-14 We shall exercise utmost care in handling private information and shall protect such information.
- 2-15 We shall respect the intellectual property rights of third parties and endeavor to avoid infringement of such third parties’ rights.
- 2-16 We shall maintain appropriate accounting procedures.
- 2-17 We shall adhere to all applicable internal policies, rules, regulations, and guidelines.

3 ■ Communications with Society and Information Disclosure

We shall communicate with society at large and disclose corporate information fairly and adequately.

- 3-1 We shall voluntarily disclose useful and reliable information in a forward-looking, fair, and timely manner in addition to disclosure required by the laws and regulations.
- 3-2 We shall NOT make any dishonest report or conceal relevant and material facts to any person inside or outside our group.

- 3-3 We shall promote interactive communication with various stakeholders such as consumers and customers, suppliers, employees, shareholders, investors, local society, government, NPOs, NGOs.



4 ■ Environmental Protection

We shall acknowledge the seriousness of global environmental issues and shall act voluntarily and affirmatively to protect the environment.

- 4-1 We shall strive to reduce adverse impact to the environment throughout the life-cycles of our products and services.
- 4-2 We shall strive to contribute a global low-carbon society.
- 4-3 We shall act affirmatively to contribute a recycling oriented society.
- 4-4 We shall promote measures for preventing

- chemical pollution and minimizing potential risks to the environment.
- 4-5 We shall promote measures and activities aimed at the restoration and protection of biological diversity.
- <Refer to *5 “Konica Minolta Environmental Policy”>

5 ■ Contribution to Society

We shall, with a global perspective, affirmatively make contributions to society while respecting local customs and cultures.

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| <p>5-1 We shall harmonize the interests of society and Konica Minolta group, and aim for harmonious co-existence.</p> <p>5-2 We shall respect local customs and cultures and make contributions to the development of local societies.</p> <p>5-3 In meeting social requirements, we shall contribute to societies not only through financial contributions, but also through</p> | <p>activities by promoting our own programs to make good use of our management resources.</p> <p>5-4 We shall promote cooperation and collaboration with various stakeholders such as local societies, government, international organizations.</p> <p>5-5 We shall support voluntary employee participation in contributing to society.</p> |
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6 ■ Respect for Employees

We shall endeavor to make the lives of employees comfortable and fulfilling, provide a safe work environment and respect each employee's personality and individuality.

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| <p>6- 1 We shall provide a working environment which fosters creative and efficient work performance and shall promote work-life balance (harmonization between work and private life).</p> <p>6-2 We shall endeavor to protect the health and safety of employees in the workplace and to maintain and improve the health of employees.</p> <p>6-3 We shall NOT tolerate any type of harassment, such as sexual harassment and bullying.</p> | <p>6-4 We shall respect human rights and shall NOT tolerate any discrimination based on race, nationality, sex, religion, political opinion, disability, etc.</p> <p>6-5 We shall NOT tolerate child labor or forced labor.</p> <p>6-6 We shall respect the diversity of our employees and shall be supportive of employees who strive to enhance their capability and expertise.</p> |
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7 ■ Responsible Actions

In the event of a violation of the principles of this Charter, in order to solve the problem senior management shall investigate the cause of the violation and develop reforms to prevent its recurrence in accordance with corporate compliance procedures. Prompt public disclosure of precise information and an explanation regarding the violation shall be made and responsibility for the violation shall be clarified. Strict and fair disciplinary action shall be taken, including with respect to senior management, where necessary.

<p>7-1 Top management shall establish an internal management system to i) prevent the occurrence of misconduct that violates the Charter of Corporate Behavior, ii) uncover misconduct at an early stage, and iii) resolve misconduct.</p> <p>7-2 Employees who have uncovered such misconduct are strongly encouraged to report their findings immediately to their managers, to the appropriate division or to internal hotline systems. Every precaution shall be taken to ensure that callers suffer no negative consequences for their reports.</p> <p>7-3 In the case of such misconduct, top management, shall immediately and</p>	<p>appropriately clarify the facts of the misconduct, investigate the causes, formulate responsible and appropriate policies and take proper actions. If required in accordance with laws and regulations, we shall explain to the public the facts surrounding the situation, policies to resolve the misconduct and measures to prevent reoccurrence.</p> <p>7-4 Top management shall clarify the responsibilities in regard to such misconduct and take disciplinary action against persons involved in such misconduct, including top management, in accordance with internal policies and regulations.</p>
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(*1) Konica Minolta Quality Policy

The Konica Minolta Group ensures maximum satisfaction and trust by our customers, paying the utmost attention to our customers and giving our top priority to the quality of products and services.

Our concept is to make steady progress in quality based on quantitative measurement and analysis of accurate data. This basic concept is demonstrated in the following affirmation:

“ Management Based On Facts”

1. Achieving the industry's top level Customer Satisfaction

We will provide products and services of high quality and high reliability to achieve the industry's top-level of Customer Satisfaction through continuous analysis of market trends and steady efforts for improvement.

2. Providing advanced products that satisfy customers' potential needs

We will always pursue ease of use from our customers' viewpoint with products on the cutting-edge of trends.

3. Establishment and development of a global Quality System

We will establish and develop a global integrated Quality System throughout the Konica Minolta Group, including worldwide affiliated companies.

4. Quality Management in the total life cycle of products and services

We will implement Quality Management to achieve our target based on quantitative measurement of quality at each life-cycle stage of products and services -- starting from planning, developing, manufacturing, usage, and disposal.

5. Continued enhancement of Quality Assurance Process

We will continue to improve job processes voluntarily and aggressively in order to enhance the Quality Assurance Process.

6. Minimization of product quality risks

We will take proactive measures and promptly respond to our customers in order to eliminate risks to our customers and our company caused by quality problems.

7. Disclosure of product safety information

We will actively disclose product safety information to ensure our customers will use our products without any anxiety and to fulfill our accountability to society.

(*2) Ten Principles of the United Nations Global Compact

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

(*3) Konica Minolta Procurement Policy

The Konica Minolta Group pursues customer satisfaction by creating innovative products and services that contribute to the development of society, according to our management philosophy, “The Creation of New Value.” In procurement activities, we establish firm partnerships with our suppliers based on fairness and transparency and aim to build a sustainable society by fulfilling social responsibilities with our suppliers.

1. OPEN

We will build transparent and reliable relationships with our suppliers and manage procurement in an open manner, while sharing objectives from a long-term and global perspective.

2. FAIR

We will carry out transactions under the principle of free competition with rational evaluation criteria, and seek mutual benefit with suppliers.

3. GLOBAL

We will have a global outlook and carry out procurement in the regions that best suit our operational needs.

4. COMPLIANCE

We will comply with all relevant laws and regulations, corporate ethics, and internal policies and regulations.

5. ECOLOGY

We will contribute to the international society and local communities by striving to take the lead in environmental protection, while reducing the impact of our operations on ecosystems.

Request to Suppliers

Based on strong partnerships with our suppliers, we ask our suppliers to focus on the following areas in order to increase customer satisfaction and fulfill social responsibilities.

1. Excellent quality

Ensuring the safety of products and services, including compliance with the safety standards of each country and region and improving quality to meet the demands of customers

2. Reasonable prices

Pursuing prices with market competitiveness

3. Response to changes in demand

Developing a stable supply system that can respond flexibly to changes in demand

4. Compliance with laws, regulations and corporate ethics

Complying with all laws and regulations of each country and region, and with corporate ethics

5. Environmental protection

Undertaking environmentally conscious business activities and material procurement

6. Respect for the human rights of workers

Respecting basic human rights, including the prohibition of child labor, forced labor, and discrimination based on ethnicity, sex, and any other grounds

7. Health and safety

Providing safe and clean work environments

8. Information security

Continuously improving information security

9. Firm management foundation

Building a firm management foundation to ensure a continuous and stable supply of materials

(*4) Konica Minolta Information Security Policy

Guided by our management philosophy of “The Creation of New Value,” we at the Konica Minolta Group are committed to providing products and services that contribute to the development of society.

We are dedicated to maintaining information security (confidentiality, integrity and availability), which is one of the most important issues related to business activities. Given this commitment, our basic approach to information security is to continuously make improvements by measuring and assessing risks associated with important information assets and applying effective measures to mitigate those risks.

“ Management Based On Facts”

1. Direction of Information Security Initiatives

We will strive to continually provide products and services and develop sound businesses while recognizing our obligation to protect information assets handled in the course of business activities.

2. Compliance with Laws and Other Requirements

We will comply with the legal requirements of Japan and other countries related to information security as well as social norms, internal company standards and contractual security obligations. On this basis we will properly accommodate agreements made by the international community.

3. Establishment of Information Security Management System

We will establish an information security management system in order to appropriately grasp business risks and changes in the risk environment and to establish and maintain response strategies. We will work to maintain, further develop and revise the system by establishing objectives for information security.

4. Risk Response

As a manufacturer we will deal with a broad range of risks related to activities from development and production to sales and service. For risk assessment, we will establish criteria to assess the relative importance of each information asset and stringently manage our assets based on these assessments.

5. Protection from Threats

We will take appropriate measures in order to protect information assets from threats such as accidents, hindrances or improper activity that would prevent the assets from being properly utilized, and in order to prevent information assets from being lost, damaged, altered or divulged.

6. Information Security Education and Training

We will provide the necessary education and training to all employees and will carry out business while recognizing our societal responsibility to use and manage information assets appropriately.

7. Continuous Improvement

We will strive to continuously make improvements by reviewing this information security policy and our management measures on a regular basis, and as necessary, within the framework of our information security management system.

8. Active Disclosure

We will communicate risks to stakeholders and be accountable to them. This policy will be disclosed to all employees and outside parties.

(*5) Konica Minolta Environmental Policy

The Konica Minolta Group aims to promote sustainable development and profitable growth. We integrate environmental, economic and social perspectives into our business strategies so that our business activities are implemented in harmony with human lives and with the environment in all aspects.

Our concept is to make steady progress toward resolution of environmental challenges based on quantitative measurement and analysis of reliable data in regard to environmental performance and impact. This basic concept is demonstrated in the following affirmation:

"Management Based On Facts"

1. Working toward a sustainable society as a global citizen
In response to the call for a sustainable society, we will conduct business activities from the perspective of on-going enhancement of performance in environmental preservation, economic growth and social responsibilities (ethics). Every one of us will enhance its knowledge and awareness on the environment, economies and societies on a global scale and act with responsibility in pursuit of a sustainable society.
2. Compliance with laws and other requirements
We will comply with legal requirements in respective countries and regions, as well as our Group standards. In addition, we will respect, in an equitable manner, expectations of our stakeholders and consensus in the international community.
3. Consideration for the environment throughout the entire life cycle of products and services
We are committed to reducing the environmental load in all stages throughout the entire life cycle of products and services, recognizing that responsibility for a product rests with its manufacture.

4. Initiatives to counter global warming
We will continuously reduce greenhouse gas emissions that derive from our business activities from the perspective of the life cycle of our products and services throughout the entire Group, recognizing that global warming is one of the most important world issues.
5. Initiatives toward a recycling-oriented society
We are always reviewing what we can do as a corporate citizen in order to create recycling-oriented society while striving for minimizing consumption of natural resources and promoting "Zero Waste Emission" activities. In addition, we will accelerate initiatives for the recovery and recycling of end-of-life products and packaging materials.
6. Prevention of chemical pollution and minimization of potential risks to the environment
We will take every countermeasure for preventing chemical pollutions, recognizing that chemical substances can impose significant impact on human health and safety and the environment. At the same time, we will continuously suppress use of chemicals and reduce discharge volume in order to minimize environmental risks.
7. Promotion of information disclosure
We will execute accountability to all the stakeholders by actively disclosing environmental information and ensuring risk communication. We will as well make every effort to accomplish our commitment to the societies. Our Environmental Policy is to be disclosed to the public.
8. Establishment of environmental objectives and targets
We establish and administer environmental objectives, targets, and management programs to translate this Environmental Policy into reality. We will continuously review such objectives, targets and programs for further improvement of our environmental performance.

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Drafted by Corporate Legal Division, Konica Minolta Inc.