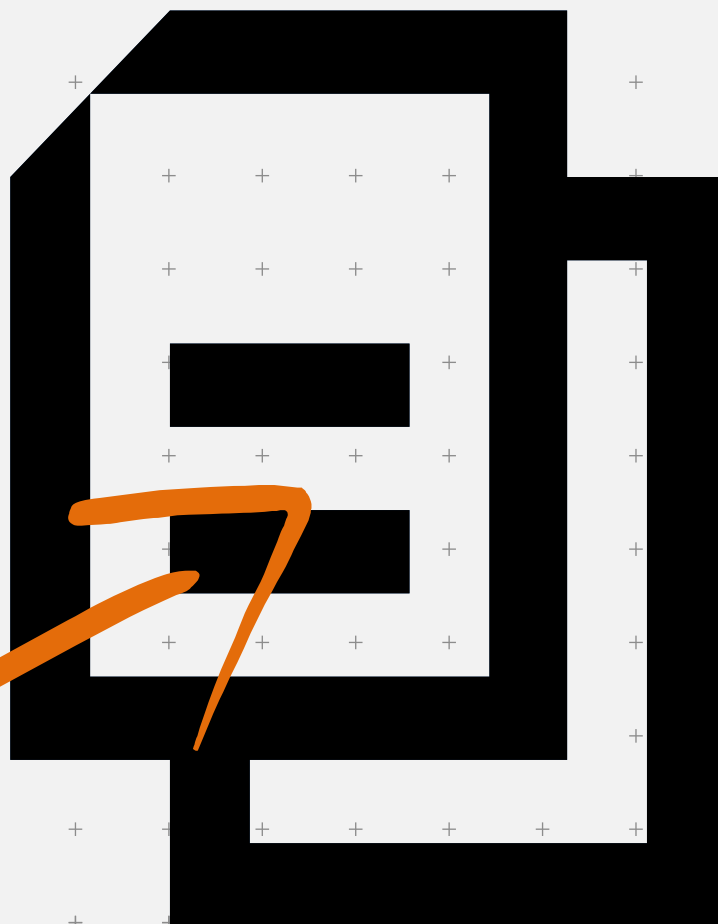


Whistleblower protection policy.

Kyocera Document Solutions Australia Pty Ltd
(ABN 77 003 852 444)



Document Information

Document Name	Whistleblower Protection Policy
Authorisation	Managing Director
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Contents

1. Purpose	3
2. Policy	3
3. Who this Policy applies to	3
4. Reportable Conduct	3
5. Reporting an Incident	4
6. Investigating a Report	5
7. Findings and Reports	6
8. Specific Protections and Remedies	6
9. Exceptional Circumstances – Public Interest & Emergency Disclosure	7

1. Purpose

KYOCERA Document Solutions Australia Pty Ltd ('**Kyocera**') is committed to fostering a culture of ethical behaviour and corporate governance. Kyocera will not tolerate any corrupt, unlawful, unethical or improper conduct by Kyocera personnel nor will Kyocera condone any act of victimisation or act in detriment against an individual who intends to report or who has reported on such conduct in accordance with this Policy.

Whistleblowing refers to the act of raising concerns about potential, suspected or actual misconduct within Kyocera and is a key element of our corporate governance. Kyocera promotes whistleblowing to achieve transparency and accountability.

This Policy covers all Whistleblower reports made to Kyocera, its reporting methods and investigations.

For any capitalised terms which are not defined within the body of this Policy please see Appendix A Definitions.

2. Policy

By issuing this Policy Kyocera intends to:

- (a) provide information on the protections available to Whistleblowers and available support from Kyocera to encourage reports in the spirit of whistleblowing;
- (b) provide information on what constitutes reportable conduct and establishing a secure framework for a person who needs to report serious unlawful, unethical or otherwise improper conduct within Kyocera;
- (c) provide information on the investigation process for reports Kyocera receives.

3. Who this Policy applies to

The Policy applies to anyone who is or has been a director, employee, contractor, dealer, distributor, agent, supplier or otherwise having contractual or commercial interaction with Kyocera; and their respective relatives, dependents or spouses.

All Kyocera employees are required to complete Whistleblower training.

4. Reportable Conduct

'Reportable Conduct' includes but is not limited to the following:

- (a) dishonest, corrupt, illegal activities;
- (b) theft, fraud, money laundering or misappropriation;
- (c) serious breach of Kyocera's policies, procedures and ethical codes, environmental commitment and other commitments;
- (d) intentional disclosure or misuse of commercially sensitive information;
- (e) activity that poses a risk to health and safety;
- (f) bullying, discrimination, harassment or abuse;

victimising or causing detriment to someone for reporting a Reportable Conduct.

Reportable conduct does not include personal or work-related grievances

Personal or work-related grievances are not within the scope of this Policy and Kyocera's whistleblowing framework should not be used for such grievances. Personal or work-related grievances should be raised directly with your manager or with the HR Manager.

Examples of personal or work-related grievances include:

- Conflicts between you and another employee;
- A decision related to your employment such as a transfer or promotion; and
- A decision related to the termination of your employment.

However personal work-related grievances do not include:

- Conduct that would be considered victimisation because a person has made, may have made or proposes to make a report under this Policy; and
- A matter that would have significant implications for any Kyocera group company;

both of which are Reportable Conduct for the purposes of this Policy.

5. Reporting an Incident

A Whistleblower acting honestly, genuinely and who reasonably believes that Reportable Conduct has occurred should make a written report (with or without disclosing their identity) through the "*Whistleblower Report*" button on the 'contact us' section of Kyocera's Website (**Whistleblower Reporting Facility**) to one or a number of the Eligible Recipients or via direct email/post/in person to Eligible Recipients (**Report**).

If the Whistleblower requests to remain anonymous, the Eligible Recipients and the WIC will use their best endeavours to prevent disclosure of the Whistleblower's identity or information that would lead to the disclosure of their identity unless:

- (a) the Whistleblower consents to disclosure;
- (b) Kyocera is required by law to disclose; or

(c) Kyocera considers it appropriate to make a disclosure to a regulator under relevant legislation.

If the Whistleblower wishes to receive feedback on the investigation findings and any measures being implemented, the Whistleblower must leave their contact details. A Whistleblower's contact details will be protected in accordance with this Policy, however, the Report will no longer be anonymous.

A Report must set out in full details and a description of the Reportable Conduct including:

- places, dates, times, person involved (both those involved and witnesses);
- the specific Reportable Conduct;
- any action taken to stop the Reportable Conduct;
- whether the Reportable Conduct is ongoing; and
- what you think the consequences of the Reportable Conduct will be.

Any details included in a Report must be accurate and factual.

A Whistleblower may also choose to make a report to a legal practitioner outside Kyocera for the purposes of obtaining legal advice or representation. Any such report is subject to the protections in the whistleblowing legislation including protection of their identity and confidentiality, regardless of whether Reportable Conduct is ultimately concluded to have taken place.

6. Investigating a Report

Any Report made to Kyocera will be referred to the WIC for investigation. The WIC will ensure that all Reports are investigated:

- (a) in strict confidence;
- (b) with due diligence;
- (c) in a reasonable timeframe; and
- (d) in accordance with rules on procedural fairness and natural justice.

The WIC will, at its discretion, devise an investigation plan and carry out an investigation that, in their reasonable opinion, is fit and appropriate for the nature of the Reportable Conduct, the information provided, the availability of resources, and any other factors WIC may consider relevant.

An example of the WIC's investigation process:

1. The WIC will carry out a preliminary review of the alleged Reportable Conduct raised in the Report and decide whether to conduct a formal investigation.
2. If a formal investigation is not necessary, the WIC must advise the Whistleblower and provide reasons for its decision (if the Whistleblower provides contact details in the Report).

3. If a formal investigation is necessary the WIC will devise an investigation plan.
4. A meeting may be held with the person or persons whose conduct has been reported ('Respondent'). The Respondent may bring a support person provided that the details of the support person are given to WIC at least five days prior to the scheduled meeting. The Respondent will be given details of the allegations as the WIC sees fit and to the extent allowed to protect the Whistleblower's identity. At this meeting, the Respondent will be given a chance to respond to the allegations and evidence.
5. The WIC may then investigate further as they see fit, including meeting with other relevant persons such as witnesses (if any) and the Whistleblower (if their identity is disclosed), liaising with various teams, departments and external organisations, and gathering any further information.
6. The WIC will make a finding based on the evidence presented or discovered.

7. Findings and Reports

At the end of the investigation, the WIC will provide a written report that:

- (a) references the Whistleblower's Report;
- (b) describes the investigation's scope, nature and finding; and
- (c) (if the Report is substantiated) outlines appropriate outcomes to be implemented, such as reporting and/or disciplinary action.

Regardless of whether a formal investigation was carried out, WIC will register and maintain the details of all Reports made, the investigation process (if any), the outcome and the current status of such reports in Kyocera's Whistleblowing Report Register.

8. Specific Protections and Remedies

Legal Action

Legislation protects a Whistleblower against certain legal actions, including:

- (a) Criminal prosecution;
- (b) civil litigation (e.g. for breach of an employment contract); or
- (c) disciplinary action.

This protection does not grant immunity to a Whistleblower for any misconduct that they were involved in that is revealed in the Report.

Detriment

It is illegal for someone to cause or threaten a Whistleblower with detriment because they believe the Whistleblower has made (or could make) a Report.

If, at any time during or following the investigation, a Whistleblower is concerned that they may be subject to detriment as a result of their making of a Whistleblower report, the Whistleblower should make a further report to any Eligible Recipient or seek advice from an external party including a legal practitioner or regulatory body.

Detriment may be actual or threatened and can include, but is not limited to:

- (a) dismissal of employment;
- (b) altering position or duties to the Whistleblower's disadvantage;
- (c) harassment or intimidation;
- (d) causing harm or injury (including psychological harm); or
- (e) damaging the Whistleblower's property, reputation or financial position.

Confidentiality

A Whistleblower can ask Kyocera to keep their identity or information that might lead to their identification confidential – Kyocera cannot disclose this information without the Whistleblower's consent (with the exception to ASIC, APRA, the Federal Police or a lawyer). If requested to, Kyocera will take appropriate steps to protect a Whistleblower's confidentiality.

9. Exceptional Circumstances – Public Interest & Emergency Disclosure

In exceptional circumstances, a Whistleblower may make Public Interest or Emergency Disclosures in accordance with the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019* (Cth). Please see table below for the criteria for making a Public Interest or Emergency Disclosure.

	Public Interest Disclosure:	Emergency Disclosure:
Can make a public interest/emergency disclosure if:	the Whistleblower has previously made a Report in accordance with this Policy; AND at least 90 days has passed and the Whistleblower does not have reasonable grounds to believe that action has been taken to address the matter.	
Whistleblower must give Kyocera written notification that:	includes sufficient information to identify the previous disclosure; AND	
	states that the Whistleblower intends to make a Public Interest disclosure.	states that the Whistleblower intends to make an Emergency Disclosure.
The disclosure must be made to:	a member of the Parliament of the Commonwealth, the Parliament of a State or the legislature of a Territory or a journalist.	

The extent of the information disclosed in the Public Interest/ Emergency Disclosure is no greater than is necessary to inform the recipient of:	the misconduct or the improper state of affairs or circumstances.	the substantial and imminent danger.
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Due to the complexity of making a Public Interest or Emergency Disclosure, Kyocera recommends taking advice from a legal practitioner prior to making such a disclosure.

Appendix A: Definitions

Eligible Recipient/s	<p>any of the following individuals:</p> <ul style="list-style-type: none"> (a) Human Resources Manager; (b) General Counsel; or (c) A person at Kyocera Manager level or executive level.
Kyocera's Whistleblowing Report Register	<p>is a register that is protected, and maintained by the WIC, which includes details on all reports made in accordance with this Policy.</p>
Whistleblower	<p>a person who reports wrongdoing in accordance with this Policy.</p>
Whistleblower Investigation Committee ('WIC')	<p>is a Committee that will receive reports made in accordance with this Policy, carry out investigations, make findings, prepare reports and maintain records in respect of Reports. WIC will comprise of:</p> <ul style="list-style-type: none"> (a) Human Resources Manager; (b) General Counsel; (c) Chief Financial Officer; and (d) Compliance and QA Manager. <p>Individual WIC members will disclose any personal (both actual and perceived) conflict of interest arising in respect of any Report presented to WIC and will not be included in the WIC investigation on that particular Report.</p> <p>WIC's Responsibilities include:</p> <ul style="list-style-type: none"> (a) examining any disclosed conflicts of interest and determining the final constitution of the WIC team prior to any investigation commencement; (b) determining the final constitution of the WIC team prior to any investigation commencement; (c) determining the severity of the Reported Conduct, the type, and scope of the conduct's impact on Kyocera, or its individuals; (d) gathering information and investigating the allegations to substantiate such allegations; (e) making a finding as to whether the report is substantiated; (f) referring the matter to relevant personnel/management team or departments to decide and implement an appropriate outcome; (g) preparing, completing and publicising a report on the process of the investigation, the findings made and the measures Kyocera have taken if any; and (h) registering and maintaining a record of all reports made in accordance with this Policy in Kyocera's Whistleblowing Report Register.