

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**CANON INC.**

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(Exact name of the registrant as specified in its charter)

JAPAN

001-15122

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(State or other jurisdiction of  
incorporation or organization)

(Commission  
File Number)

(IRS Employer  
Identification No.)

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30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo 146-8501, Japan

(Address of principle executive offices)

(Zip code)

Sachiho Tanino, +81-3-3758-2111,  
30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo 146-8501, Japan

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(Name and telephone number, including area code, of the  
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed and provide the period to which the information in this form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2019 to December 31, 2019.

## **Section 1 - Conflict Minerals Disclosure**

Established in 1937, Canon Inc. is a Japanese corporation with its headquarters in Tokyo, Japan. Canon Inc. is one of the world's leading manufacturers of office MFDs, plain paper copying machines, laser printers, cameras, inkjet printers, diagnostic equipment and lithography equipment. Canon Inc. earns revenues primarily from the manufacture and sale of these products domestically and internationally.

Canon Inc. and its consolidated companies fully have been aware of conflict minerals issue and have been working together with business partners and industry entities to address the issue of conflict minerals.

In response to Rule 13p-1, Canon Inc. conducted Reasonable Country of Origin Inquiry and due diligence based on the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas," for its various products.

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Conflict Minerals Disclosure**

A copy of Conflict Minerals Report of Canon Inc. for the reporting period from January 1, 2019 to December 31, 2019 is provided as Exhibit 1.01 hereto and is publicly available at:

<https://global.canon/en/csr/conflict/index.html>

### **Item 1.02 Exhibit**

Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 hereto.

## **Section 2 - Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 - Conflict Minerals Report for the reporting period from January 1, 2019 to December 31, 2019

## SIGNATURES

Pursuant to the requirement of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Canon Inc.  
(Registrant)

/s/ Toshizo Tanaka

Toshizo Tanaka  
Executive Vice President & CFO

Canon Inc.  
30-2, Shimomaruko 3-chome,  
Ohta-ku, Tokyo 146-8501, Japan

Date May 28, 2020

**Canon Inc.**  
**Conflict Minerals Report**  
**For the Period from January 1, 2019 to December 31, 2019**

This Conflict Minerals Report for the period from January 1, 2019 to December 31, 2019, is presented as an exhibit to the Specialized Disclosure Report on Form SD, to comply with Rule 13p-1 under the Securities Exchange Act of 1934.

**1. Introduction (Background to the disclosure of the Conflict Minerals Report)**

Established in 1937, Canon Inc. is a Japanese corporation with its headquarters in Tokyo, Japan. Canon Inc. is one of the world's leading manufacturers of office MFDs, plain paper copying machines, laser printers, cameras, inkjet printers, diagnostic equipment and lithography equipment. Canon Inc. earns revenues primarily from the manufacture and sale of these products domestically and internationally. For details of corporate activities please refer to our annual report filed on Form 20-F.

Canon Inc. is listed on the New York Stock Exchange and is subject to the final rules issued by the United States Securities and Exchange Commission (“**SEC**”) to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“**Dodd-Frank Act**”).

In response to Rule 13p-1, Canon Inc. conducted a “Reasonable Country of Origin Inquiry” (“**RCOI**”) for products manufactured or contracted to manufacture by Canon Inc. and its consolidated subsidiaries (“**Canon**” or “**Canon Group**”) from January 1, 2019 to December 31, 2019 (“**reporting period**”). The inquiry identified four minerals classified as conflict minerals—namely tin, tantalum, tungsten, and gold (“**3TG**”)—that originated in the Democratic Republic of the Congo and adjoining countries (“**covered countries**”) and did not come from recycled or scrap minerals, that are used in some of the parts or materials that make up Canon Group's products. Further, Canon Inc. conducted due diligence on the source and chain of custody of 3TG (“**due diligence**”) identified as originating from covered countries.

**2. Application of Conflict Minerals Report on Canon and products subject to disclosure**

As of December 31, 2019, Canon Inc. had 361 consolidated subsidiaries, of which 54

subsidiaries manufactured products or contracted to manufacture products in the reporting period for which 3TG were necessary to the functionality and production, and were subject to the reporting requirements under the SEC’s final rules regarding the Dodd-Frank Act. In total, 55 companies of the Canon Group, including Canon Inc. and those 54 consolidated subsidiaries conducted the RCOI. The subsidiaries that conducted the RCOI include certain marketing companies that contracted with manufacturers outside the Canon Group to manufacture items for sale outside the Canon Group.

The business operations of Canon can be divided into the following four categories: the Office Business Unit, the Imaging System Business Unit, the Medical System Business Unit and the Industry and Others Business Unit. The Office Business Unit includes office MFDs, printers, and copying machines for personal and office use as well as production print products for print professionals. The Imaging System Business Unit includes digital cameras as well as lenses and various related accessories. It also includes compact photo printers, inkjet printers, large-format inkjet printers, inkjet production photo printers, and flatbed scanners. The Medical System Business Unit includes Computed tomography (CT), Magnetic resonance imaging (MRI), ultrasound, X-ray systems, and clinical laboratory systems, as well as digital radiography (DR) systems and ophthalmic equipment. The Industry and Others Business Unit includes semiconductor lithography equipment, flat panel display (FPD) lithography equipment, organic light-emitting diode (OLED) panel manufacturing equipment, network cameras, digital cinema cameras, broadcast HDTV lenses and projectors.

In each of these units, electronic components and substrates which contain 3TG are used in the majority of products manufactured by or contracted to manufacture by Canon.

Canon Group purchases raw materials, parts and components which include 3TG and manufactures products. Canon Group is located downstream in the 3TG supply chain, and does not directly purchase 3TG from mines. Therefore, Canon Group had to rely on information provided by the first-tier suppliers to the Canon Group (“**first-tier suppliers**”) in identifying the source country of the 3TG.

### **3. Basic principles regarding response to conflict minerals**

Canon Inc. established the “Basic Approach of the Canon Group Regarding Conflict Minerals” in September 2012. This has been published on Canon Inc.’s official website and applied to the entire Canon Group.

URL: <https://global.canon/en/csr/conflict/policy.html>

### **4. RCOI and Due Diligence**

The design of Canon's RCOI and due diligence measures is in conformity with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (third edition)" ("**OECD Guidance**"). Canon took the steps described below in accordance with the five steps laid out in the OECD Guidance.

**a. Step 1: Establish strong company management systems**

- In order to respond to the conflict minerals situation, Canon established a cross-functional Conflict Minerals Response Project Team ("**Project Team**") in its headquarters under the direction of a representative director in charge (Executive Vice President & CFO) in December 2010. Moreover, Canon designated a person in charge of conflict minerals in each of its group companies that manufacture or contract to manufacture products. The Project Team currently operates as the Working Group on Conflict Minerals ("**Working Group**").
- As stated above, Canon Inc. established the "Basic Approach of the Canon Group Regarding Conflict Minerals" in September 2012.
- In March 2016, Canon established the "Guidelines for Compliance with Conflict Minerals Regulation" that clarified the responsible divisions and the framework for handling conflict minerals issues as well as the survey process, for the persons involved in the Canon Group.
- In July 2019, Canon Inc. summoned the persons in charge of conflict minerals for Canon Group's domestic subsidiaries that manufacture or contract to manufacture products and held a meeting to share the result of the 2018 conflict minerals survey and discuss Canon's policies for the survey of 2019. Moreover, for the persons in charge of conflict minerals matters for overseas subsidiaries, Canon Inc. shared information by e-mail, video and telephone conference.
- Canon created and distributed the Conflict Minerals Survey Manual to the first-tier suppliers.
- Canon requested the first-tier suppliers to sign and submit written confirmation ("**Certificate of Consent**") of their agreement and cooperation with Canon's "Basic Approach of the Canon Group Regarding Conflict Minerals" and their agreement to consult with the Canon Group concerning appropriate measures should any affiliation with armed groups be discovered in the supply chain.
- Using its Conflict Minerals Information Management System, Canon Inc. linked survey responses to product information, conducted product-level assessments, and stored the assessment results in a database, except for such products as

handled by newly joined subsidiaries. Internal rules require that data records be retained for at least five years.

- Canon Inc. is a member of the Responsible Minerals Trade Working Group (“**RMTWG**”) of the Japan Electronics and Information Technology Industries Association (“**JEITA**”). As part of its initiatives, the RMTWG held conflict minerals inquiry briefings for suppliers in supply chains in the electrical and electronics industry. Step 3 below provides details of the industry initiatives on conflict minerals that Canon Inc. participates in.
- As an early-warning risk-awareness system for conflict minerals specified in the OECD Guidance, Canon Inc. established a grievance mechanism — “Contact Point for Reporting Concerns Regarding Conflict Mineral Issues” — on its official website in 2015. No reports from employees, suppliers, or other stakeholders were received by the contact point in 2019.  
URL: <https://global.canon/en/contact/conflict/conflict-form-e.html>

**b. Step 2: Identify and assess risks in the supply chain**

- Canon designed a framework to identify each of the parts and materials used in the products that it manufactured or contracted to manufacture. Canon used its production and shipping management system, which includes bills of materials for products and also used its procurement system, to identify parts and materials required in products planned for production and shipping between January and the end of December 2019. (Canon Group companies not using such system made use of a similar method to identify parts and materials.) 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**”). The CMRT is published by the Responsible Minerals Initiative (“**RMI**”), one of the programs of the Responsible Business Alliance (“**RBA**”). Canon requested the 3,328 first-tier suppliers that were identified as possibly using 3TG to report their status of 3TG using the CMRT. Suppliers that were not using 3TG for their parts and materials had the option of reporting their status through an alternative method, instead of using the CMRT.
- In addition to the RCOI described above, 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.
- As of March 6, 2020, Canon had received responses from 95 percent of all first-tier suppliers surveyed.
- 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. The RMI implements cross recognition with the London Bullion Market Association (LBMA) and the Responsible Jewellery Council (RJC).

**c. Step 3: Design and implement a strategy to respond to identified risks**

- The head of the Working Group reported the progress of conflict minerals response activities to the representative director in charge.
- Moreover, the Working Group reported in November 2019 on its progress to relevant directors and executive officers of Canon Inc. as well as the presidents of the relevant domestic and overseas subsidiaries by distributing the material.
- Canon Inc. is a key member of JEITA’s RMTWG. The RMTWG is allied with the RMI, which play the leading role in the response to conflict minerals. Canon Inc. has held the role of co-chair of the RMTWG since 2013.
- Canon Inc. has also served as team leader of the RMTWG’s Smelter Support Team since 2015. In this capacity, Canon Inc., 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).
- Canon Inc. participates in the Japan Conflict-Free Sourcing Working Group (CFSWG), a joint initiative by JEITA’s RMTWG and major Japanese automobile manufacturers, and serves as the CFSWG vice-chair.
- In addition to the above activities, Canon Inc. has been a member of the RMI since April 2015. Its membership code is “CNON.” Canon Inc. assists RMI activities as a corporate member of the RMI.

**d. Step 4: Carry out independent third-party audit of smelter/refiner’s due diligence practices**



- As a RMI member, Canon Inc. supports audits under the RMAP carried out by the RMI on SORs.

**e. Step 5: Report annually on supply chain due diligence**

- In accordance with the Dodd-Frank Act and the SEC's final rules, on or before May 31, 2020, Canon Inc. plans to file a Form SD and Conflict Minerals Report (this report) with the SEC, and plans to publish the same information on its official website.
- Canon Inc. has been reporting its activities in response to conflict minerals in its Annual Report and Sustainability Report since 2011.

**5. Survey results for the 2019 calendar year**

**a. Result of RCOI and due diligence**

- Canon conducted the RCOI on 3,328 first-tier suppliers that possibly use 3TG. Canon conducted further due diligence on first-tier suppliers which reported the use of 3TG from the covered countries.
- In cases where 3TG originating from covered countries were used, Canon received some responses indicating the minerals in question had been sourced from SORs that are conformant with the RMAP.
- Within the scope of the responses, there was nothing to clearly suggest that the Canon Group's purchasing of parts and materials contributed to funding armed groups.

**b. Result of SORs survey**

- Canon analyzed the information on the SORs mentioned in the responses from the supply chain through the RCOI, with reference to the RMI's SOR information. The RMI classifies SORs based on the auditing status. The website of the RMI provides information of the auditing status under the RMAP. <http://www.responsiblemineralsinitiative.org/>
- 261 SORs in Canon supply chain were identified as RMAP conformant and 5 SORs were identified as Active in the RMAP. The remaining 61 SORs were neither RMAP conformant nor Active in the RMAP. Appendix 1-1, 1-2 and 1-3 provide lists of these SORs.
- Canon was unable to determine whether the remaining entities reported by the first-tier suppliers as SORs were truly SORs.

- Due to inadequate information from its supply chains, Canon was unable to determine the country or region of origin of many 3TG used in Canon Group products.
- Appendix 1-4 lists examples of 3TG countries and regions of origin first-tier suppliers reported to Canon through CMRT responses.
- Based on the results of the RCOI and due diligence mentioned above, Canon was unable to determine whether the 3TG used for the products of the Canon Group financed or benefitted armed groups in the covered countries.

## **6. Efforts to determine the mine or location of origin of 3TG with the greatest possible specificity and risk mitigation**

The following efforts to determine the mine or location of origin of 3TG with the greatest possible specificity are planned to be implemented from 2020 onwards.

- Canon will continue promoting verification operations of high-risk first-tier suppliers in accordance with Canon's Guidelines for Compliance with Conflict Minerals Regulation.
- Canon Inc. will continue its participation at JEITA's RMTWG, CFSWG and RMI, and support activities to make entire supply chains conflict free.

## **7. Independent monitoring**

- KPMG AZSA Sustainability Co., Ltd. conducted an independent private sector audit of this report. The audit assessed whether the due diligence framework Canon designed conforms to the OECD Guidance's due diligence framework and whether the due diligence description in this report is consistent with the actual measures Canon undertook. The independent assurance report is attached in Appendix 2.

## **Forward-Looking Statements**

This report contains not only past and present facts about Canon, but also future forecasts based on plans, prospects, management policies and strategies as of the publication date. These future forecasts are assumptions or estimations based on information available at the time the report was prepared. Due to a range of variables, however, the results or circumstances of our future business activities may vary from the forecasts contained herein.

**Appendix 1.**

**1. List of the SORs identified in Canon's supply chain which are RMAP conformant (As of March 6, 2020)**

<b>Metal</b>	<b>SoRs</b>	<b>Country/Region</b>
Gold	L'Orfebre S.A.	ANDORRA
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Marsam Metals	BRAZIL
Gold	Umicore Brasil Ltda.	BRAZIL
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Royal Canadian Mint	CANADA
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	SAAMP	FRANCE
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	Aurubis AG	GERMANY

Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Bangalore Refinery	INDIA
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	8853 S.p.A.	ITALY
Gold	Chimet S.p.A.	ITALY
Gold	Italpreziosi	ITALY
Gold	Safimet S.p.A	ITALY
Gold	T.C.A S.p.A	ITALY
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	Chugai Mining	JAPAN
Gold	Dowa	JAPAN
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Japan Mint	JAPAN
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN

Gold	Kazzinc	KAZAKHSTAN
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	REMONDIS PMR B.V.	NETHERLANDS
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Boliden AB	SWEDEN
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	PAMP S.A.	SWITZERLAND
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Valcambi S.A.	SWITZERLAND

Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Istanbul Gold Refinery	TURKEY
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	Materion	UNITED STATES OF AMERICA
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA

Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	H.C. Starck Ltd.	JAPAN
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	Power Resources Ltd.	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	KEMET Blue Powder	UNITED STATES OF AMERICA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V.	BELGIUM
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	Mineracao Taboca S.A.	BRAZIL

Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	Soft Metais Ltda.	BRAZIL
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Tin	CV Ayi Jaya	INDONESIA
Tin	CV Dua Sekawan	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV United Smelting	INDONESIA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	PT Aries Kencana Sejahtera	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Babel Surya Alam Lestari	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Bangka Serumpun	INDONESIA



Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Inti Stania Prima	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Rajawali Rimba Perkasa	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	PT Tirus Putra Mandiri	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	Dowa	JAPAN
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Minsur	PERU
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Fenix Metals	POLAND
Tin	Metallo Spain S.L.U.	SPAIN
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	Thaisarco	THAILAND

Tin	Alpha	UNITED STATES OF AMERICA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	H.C. Starck Tungsten GmbH	GERMANY

Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM

**2. List of the SORs identified in Canon's supply chain which are Active in RMAP (As of March 6, 2020)**

<b>Metal</b>	<b>SoRs</b>	<b>Country/Region</b>
Gold	SAFINA A.S.	CZECHIA
Tantalum	CP Metals Inc.	UNITED STATES OF AMERICA
Tin	Precious Minerals and Smelting Limited	INDIA
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION

**3. List of the SORs identified in Canon's supply chain which are neither RMAP conformant nor Active in RMAP (As of March 6, 2020)**

<b>Metal</b>	<b>SoRs</b>	<b>Country/Region</b>
Gold	Morris and Watson Gold Coast	AUSTRALIA
Gold	Tony Goetz NV	BELGIUM
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	Guangdong Jinding Gold Limited	CHINA

Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHINA
Gold	Lingbao Gold Co., Ltd.	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA
Gold	Shandong Humon Smelting Co., Ltd.	CHINA
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY
Gold	CGR Metalloys Pvt Ltd.	INDIA
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA
Gold	Sai Refinery	INDIA
Gold	Sovereign Metals	INDIA
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF
Gold	State Research Institute Center for Physical Sciences and Technology	LITHUANIA
Gold	Modeltech Sdn Bhd	MALAYSIA
Gold	Caridad	MEXICO
Gold	Morris and Watson	NEW ZEALAND
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION

Gold	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	Sudan Gold Refinery	SUDAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	African Gold Refinery	UGANDA
Gold	Dijllah Gold Refinery FZC	UNITED ARAB EMIRATES
Gold	Fujairah Gold FZC	UNITED ARAB EMIRATES
Gold	International Precious Metal Refiners	UNITED ARAB EMIRATES
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	Pease & Curren	UNITED STATES OF AMERICA
Gold	QG Refining, LLC	UNITED STATES OF AMERICA
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	Universal Precious Metals Refining Zambia	ZAMBIA
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Super Ligas	BRAZIL
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	Pongpipat Company Limited	MYANMAR
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA

**4. Examples of the countries and regions of origin from which the SORs listed in Appendix 1-1, 1-2 and 1-3 are believed to have sourced 3TG**

Albania	Guyana
Andorra	Hungary
Angola	India
Argentina	Indonesia
Armenia	Ireland
Australia	Israel
Austria	Italy
Azerbaijan	Japan
Belarus	Jersey (Bailiwick of Jersey)
Belgium	Kazakhstan
Bolivia	Kenya
Brazil	Korea, Republic of
Bulgaria	Kyrgyz Republic
Burkina Faso	Laos
Cambodia	Liberia
Canada	Luxembourg
Central African Republic	Madagascar
Chile	Malaysia
China	Mauritania
Colombia	Mexico
Cote d'Ivoire	Mongolia
Czech Republic	Morocco
Democratic Republic of the Congo	Mozambique
Djibouti	Myanmar
Dominican Republic	Namibia
Ecuador	Netherlands
Egypt	New Zealand
Estonia	Niger
Ethiopia	Nigeria
Finland	Papua New Guinea
France	Peru
Germany	Philippines
Ghana	Poland
Guinea	Portugal

Republic of the Congo

Russian Federation

Rwanda

Saudi Arabia

Sierra Leone

Singapore

Slovakia

South Africa

Spain

Suriname

Sweden

Switzerland

Taiwan

Tanzania

Thailand

Turkey

Uganda

United Arab Emirates

United Kingdom

United States of America

Uzbekistan

Viet Nam

Zambia

Zimbabwe

## Appendix 2.

### INDEPENDENT ASSURANCE REPORT

To the Board of Directors and Stockholders of Canon Inc.

We have undertaken a reasonable assurance engagement of:

- management's assertion, included in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2019, that the design of Canon Inc.'s (the "Company") due diligence framework is in conformity with the criteria set forth in the Organisation of Economic Co-Operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016 ("OECD Due Diligence Guidance"), and
- whether the Company's description of the due diligence measures it performed, as set forth in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2019, is consistent, in all material respects, with the due diligence process that the Company undertook.

Management is responsible for the design of the Company's due diligence framework and the description of the Company's due diligence measures set forth in the Conflict Minerals Report, and performance of the due diligence measures. Our responsibility is to express an opinion on the design of the Company's due diligence framework and on the description of the due diligence measures the Company performed, based on the procedures we have performed.

Our reasonable assurance engagement was conducted in accordance with 'International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information', issued by the International Auditing and Assurance Standards Board, and the standards applicable to performance audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, and, accordingly, included examining, on a test basis, evidence about the design of the Company's due diligence framework and the description of the due diligence measures the Company performed, and performing such other procedures as we considered necessary in the circumstances. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our reasonable assurance engagement was not conducted for the purpose of evaluating:

- The consistency of the due diligence measures that the Company performed with either the design of the Company's due diligence framework or the OECD Due Diligence Guidance;
- The completeness of the Company's description of the due diligence measures performed;
- The suitability of the design or operating effectiveness of the Company's due diligence process;
- Whether a third party can determine from the Conflict Minerals Report if the due diligence measures the Company performed are consistent with the OECD Due Diligence Guidance;
- The Company's reasonable country of origin inquiry (RCOI), including the suitability of the design of the RCOI, its operating effectiveness, or the results thereof; or
- The Company's conclusions about the source or chain of custody of its conflict minerals, those products subject to due diligence, or the DRC Conflict Free status of its products.

Accordingly, we do not express an opinion or any other form of assurance on the aforementioned matters or any other matters included in any section of the Conflict Minerals Report other than section 4.

In our opinion,

- the design of the Company's due diligence framework for the reporting period from January 1 to December 31, 2019, as set forth in section 4 of the Conflict Minerals Report is in conformity, in all material respects, with the OECD Due Diligence Guidance, and
- the Company's description of the due diligence measures it performed as set forth in section 4 of the Conflict Minerals Report for the reporting period from January 1 to December 31, 2019, is consistent, in all material respects, with the due diligence process that the Company undertook.

We have complied with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. In accordance with International Standard on Quality Control 1, we maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements,



professional standards and applicable legal and regulatory requirements.

/s/ KPMG AZSA Sustainability Co., Ltd.

KPMG AZSA Sustainability Co., Ltd., Tokyo

May 28, 2020