



Appendix A: Ricoh Europe's Corporate Social Responsibility Policy

To grow as a respected enterprise, the Supplier must fully discharge its corporate social responsibility (CSR) from a consistent global perspective and throughout every aspect of its operations. To ensure this, the following principles are to be observed, with the proper social awareness and understanding, compliant with both the letter and the spirit of national laws and the rules of international conduct.

Integrity in Corporate Activities

1. Every company in the Supplier group will develop and provide useful products and services, with high quality, safety, reliability and ease of use, while maintaining security of information and giving proper consideration to the environment.
2. Every company in the Supplier group will compete fairly, openly and freely, maintaining normal and healthy relationships with political institutions, government administration, citizens and organizations.
3. Every company in the Supplier group will take responsibility for managing and safeguarding its own information and that of its customers.

Harmony with the Environment

4. Every company in the Supplier group will take responsibility, as a citizen of the world, working voluntarily and actively to preserve the environment.
5. Every company in the Supplier group, and all employees of each company, will seek to implement technological innovations that reflect environmental concerns and will participate in on-going activities to preserve the environment.

Respect for People

6. Every company in the Supplier group will, quite apart from corporate group activities, maintain a working environment that is safe and that makes it easier for its staff to perform their duties, respecting their richly individual characteristics and encouraging their autonomy and creativity.
7. Every company in the Supplier group will respect the rights of all those connected with it, and will seek to create a cheerful working environment, free of discrimination.
8. No company in the Supplier group will permit forced labour or child labour, and none will tolerate the infringement of human rights.

Harmony with Society

9. Every company in the Supplier group will, as a good corporate citizen, actively engage in activities that contribute to society.
10. Every company in the Supplier group will respect the culture and customs of its country or region, and will operate so as to contribute to their development.
11. Every company in the Supplier group will engage in the fullest possible communications with society, seeking actively to provide proper and unbiased disclosure of corporate information.



Appendix B: Ricoh Europe's Anti-Corruption Policy

In this policy, we refer to Ricoh Europe to include all Ricoh Europe Plc's operating companies.

1. Policy Statement

Ricoh Europe does not tolerate any form of corruption and is committed to complying with applicable anti-corruption laws in all countries in which Ricoh Europe conducts business.

Ricoh Europe requires its Employees and Third Parties (defined below) at all times to act honestly and with integrity. Ricoh Europe will not tolerate any Employee or Third Party being involved in any level of bribery or corruption. Employees and Third Parties are required to report any circumstances which are in breach of Ricoh Europe's Anti-Corruption Policy. All reported incidences of actual or suspected bribery or corruption will be promptly and thoroughly investigated and dealt with appropriately.

2. Application of this Policy

This policy applies to all Employees of Ricoh Europe and Third Parties performing duties for or on behalf of Ricoh Europe whether or not directly employed by Ricoh Europe.

This policy extends to Ricoh Europe and Third Parties of Ricoh Europe wherever located, regardless of geographical location.

3. Definitions of Terms Used in this Policy

Bribe: This includes:

- Offering, promising or giving anything of value to improperly influence another in order to obtain business for Ricoh Europe; or
- Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by Ricoh Europe.

Bribes can include money, gifts, hospitality, entertainment, expenses, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

Employees: All workers performing duties on behalf of Ricoh Europe, whether or not employed directly by Ricoh Europe.

Facilitation Payments: Payments that are requested by Foreign Government Officials to speed up a routine government action such as:

- Processing licences, permits, or other official documents;
- Processing government paperwork such as visas and work orders; and
- Providing services such as police protection and mail pick-up and delivery.

Foreign Government Officials: Officials of any government department or agency; officials of any public international organisation (e.g., the United Nations); political parties and party leaders; candidates for public office; executives and employees of government-owned or government-run companies (such as a doctor in a state-controlled hospital); anyone acting on behalf of any of these officials; and an individual holding a legislative, administrative or judicial position.

Third Party/Parties: Include agents; brokers; partners; consultants; contractors; joint venture partners; suppliers; subcontractors; and other representatives performing work on behalf of,



or for the benefit of Ricoh Europe or supplying goods, services or other deliverables to Ricoh Europe.

4. Bribery and Corruption

It is illegal to pay or receive a Bribe whether paid or received directly or indirectly. There is no need for the Bribe to be successful to be viewed as corrupt, the offering of it is enough to amount to a criminal offence.

These principles apply equally in any jurisdiction in which Ricoh Europe operates or carries on business.

5. Facilitation Payments

It is illegal to make any sort of payment or give anything of value to a Foreign Government Official where this is to obtain or retain business or some other commercial advantage for Ricoh Europe.

In some countries, it may be customary for Foreign Government Officials to request Facilitation Payments. However, Facilitation Payments made anywhere in the world are prohibited by Ricoh Europe and you must not make payments regardless of local custom.

6. Gifts, Hospitality, Entertainment and Travel Expenses

When you are doing business with Ricoh Europe:

You must not offer or receive gifts, hospitality or entertainment that could influence, or be perceived to influence your business decision. Gifts to friends or relatives should not be offered or accepted;

Hospitality and entertainment should only be offered or accepted if it is of reasonable and appropriate value (and sanctioned by the relevant persons designated within your company);

Provision of business gifts, hospitality and business entertainment to a Foreign Government Official is prohibited and may be considered a Bribe.

7. Third Party Payments, Use of Agents and Due Diligence

You must not make a payment to any person if you know or suspect that the person may use or offer all or a portion of the payment directly or indirectly as a Bribe.

Ricoh Europe will conduct checks to ensure that Third Parties engaged on behalf of Ricoh Europe are legitimate service providers. Before engaging the services of any party, you are required to undertake appropriate due diligence checks. This should include a corruption risk assessment of factors including the country in which the business is to be conducted, the party's potential business partners and the nature of the proposed project or transaction. Paperwork and records documenting the due diligence checks and risk assessment should be retained for a reasonable period for audit purposes.

8. Recordkeeping

All payments made or received by Ricoh Europe or by a Third Party must be accurately recorded in Ricoh Europe or Third Party's financial books and records. All financial transactions must be authorised by appropriate management in accordance with internal control procedures.

9. Obligations to Report Breaches of Anti-Corruption Laws



Employees and Third Parties are required to draw attention to circumstances where they believe that there may have been breaches of this Policy or related improper behaviour by other Employees or Third Parties.

You must report any instances of suspected corruption to your contact at Ricoh Europe or the Anti-Corruption Officer for Ricoh Europe, as well as the relevant persons designated within your company.

10. Consequences for Breaches of Anti-Corruption laws

Consequences may include unlimited fines for corporations and/or individuals, imprisonment for 10 years for individuals and/or directors, disqualification from acting as a director and significant monetary fines against individuals, loss of the ability to trade in certain jurisdictions, debarment from bidding for government contracts, loss of business, legal action by competitors, litigation and substantial investigation expenses.

11. Enforcement and Discipline

Ricoh Europe views corruption and bribery very seriously. Ricoh Europe will investigate all allegations of corruption and take legal and/or disciplinary action in all cases where it is considered appropriate. Where a case is referred to the police or other law enforcement agency, Ricoh Europe will co-operate fully with the criminal investigation which could lead to the Employee or a Third Party being prosecuted.