

Modern Slavery Act Transparency Statement

For the financial year ended 31 March 2019

Ricoh Europe PLC, Ricoh UK Limited, Ricoh Capital Limited, Ricoh Imaging UK Limited, Ricoh UK Products Limited, (for the purposes of this statement collectively known as the “Ricoh UK Companies”) are committed to ensuring that our businesses and supply chains respect human rights. We are committed to improving our practices to combat slavery and human trafficking.

Ricoh adheres to guidelines of ISO 26000 and is a proud member of the United Nations Global Compact. Ricoh has consistently been recognised through awards in the context of corporate social responsibility, for example:

- Ricoh received a gold rating from EcoVadis in their global supplier survey for the fourth consecutive year. EcoVadis assesses corporate policies, initiatives and achievements in areas concerning the Environment, Labor Practices, Fair Business Practices, and Supply Chain.
- Ricoh continues to be recognised in the [FTSE4Good Index Series](#) and the [FTSE Blossom Japan Index](#).
- Ricoh was awarded “Prime” status in [Oekom's Sustainability Rating](#).

Ricoh Group’s senior management is actively involved in Ricoh’s Corporate Social Responsibility practices and has issued the following statement to reflect the importance the Ricoh Group places on its responsibilities:

‘All of our suppliers are required to comply with Ricoh’s Supplier Code of Conduct and act in accordance with our ethical standards by conducting business with integrity and fairness, providing safe working conditions and using environmentally responsible practices. We expect our suppliers to adhere to the principles outlined in Ricoh’s Supplier Code of Conduct and place the same high level of importance on this agenda as we do’ **Kyoichiro Fujimoto**, Executive Vice President, Ricoh Europe PLC.

Our organisational structure, our business, and our supply chains

The Ricoh Group is a leading provider of document management solutions, IT services, communication services, commercial and industrial printing, digital cameras, and industrial systems. The Ricoh UK Companies are part of the wider Ricoh Group and our ultimate parent company is Ricoh Company, Ltd. Ricoh Company, Ltd. has its head office in Tokyo and is listed on the Tokyo Stock Exchange. The Ricoh Group operates in around 200 countries and regions worldwide and sources goods and services both locally and abroad.

Ricoh Developed Products and Services

Ricoh Group operating companies in Europe obtain Ricoh developed products and services from another Ricoh group company, Ricoh Europe SCM BV. Ricoh Europe SCM BV is located in the Netherlands and is the centralised distributor of Ricoh products that have been designed, developed and produced by Ricoh companies in China, Japan, Thailand, the United Kingdom, France, and the United States of America. Our first tier suppliers for these products are also in these countries. The proportion of products which the Ricoh Group purchases from each of these areas are as follows:

China	32%
Japan	53%
Thailand	9%

Non-Ricoh Developed Products and Services

Procurement departments within the relevant Ricoh UK Companies manage the suppliers of non-Ricoh developed products that are utilised on a local level. We obtain non-Ricoh developed products and services from a number of different suppliers depending on the requirements of our customers and our business. Some products and services are procured on a global basis using international suppliers. However, they are mainly sourced from local UK entities.

Other relationships

As well as relationships with suppliers, Ricoh has established other relationships which assist it to regularly evaluate and address human rights issues as part of its worldwide commitment to fair labour practices within the Ricoh Group supply chain.

- The UN Global Compact, launched in July 2000, advocates ten principles in the fields of human rights, labour, environment and anti-corruption. Ricoh Company, Ltd. joined the Compact in 2002 and is committed to ensuring these principles are observed in all areas and in all operations.
- Ricoh Company, Ltd. is a member company of the Responsible Minerals Trade Working Group launched in May 2012 by JEITA¹ and of the Japan Conflict-Free Sourcing Working Group. In 2017-2018, Ricoh Company, Ltd. participated in general meetings of both Working Groups.
- The Ricoh Group is committed to ensuring the highest level of working conditions for its employees in the UK as well as in all of its operations irrespective of location. Ricoh UK Limited is an active member of many industrial institutions in the UK, including but not limited to the Confederation of British Industry, Living Wage Foundation, and Business in the Community.
- Ricoh UK Limited scored 100% and achieved 5-star rating in the 2018 BITC CR Index which is the UK's leading voluntary benchmark of corporate responsibility. During 2018, Ricoh UK Limited worked with BITC and several other BITC member companies to help develop and test a new Responsible Business online assessment tool, the BITC Responsible Business Tracker, which has since been launched and replaces the CR Index.

Our policies in relation to slavery and human trafficking

The Ricoh UK Companies, as well as all operations within the Ricoh Group, are committed to the fulfilment of our corporate social responsibilities ("CSR"). The Ricoh Group's CSR page can be found at <http://www.ricoh.com/sustainability/>. The Ricoh Group has developed and implemented policies that apply to combating modern slavery and human trafficking on a global level to ensure consistency throughout every aspect of its operations. The Ricoh Group has done this through the establishment of:

- [The Ricoh Business Conduct Guidelines](#) that establishes the basic standards to ensure that executives and employees of the company, when engaging in corporate activities to advance the Ricoh Group, shall act in accordance with social ethics and in full compliance with the law.

In addition, and as part of the Ricoh UK Companies' commitment to combatting modern slavery and human trafficking, we have implemented the following policies:

¹ JEITA – Japan Electronics and Information Technology Industries Association - <http://www.jeita.or.jp/english/>

ISO26000

The Ricoh Group recognises ISO26000 as a reference document that provides guidance for implementation of CSR strategy and policies across the organisation. As such Ricoh operating companies across EMEA are committed to continually integrating the ISO26000 standard into our business operations. Further information on our CSR activities in respect of human rights can be found on our Human Rights page at <https://www.ricoh.com/sustainability/society/human-rights/>.

Procurement policy

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Ricoh Group companies must follow the Ricoh Business Conduct Guidelines when conducting purchasing activities. Our procurement policy also requires compliance with our ethical, social, security and environmental standards which are set out in our policies and our [Supplier Code of Conduct](#).

Our relationships with suppliers are based on lawful, socially responsible and fair practices. We expect our suppliers to obey the laws and regulations that require them to treat workers fairly and provide a safe and healthy work environment and we contract on this basis.

Our procurement activities are aligned to our CSR policies, ensuring, where possible (amongst other things), we:

- select suppliers that have a like-minded approach to CSR; and
- avoid suppliers that exploit child labour, disregard basic health and safety legislation, human rights, basic social legislation and companies that exploit third party intellectual property rights without having obtained the owners' consent.

Some of Ricoh Group's larger suppliers may have their own internal procurement policies and/or codes of conduct, which are in line with Ricoh Group's requirements. In these situations, the relevant supplier's code of conduct will be accepted in place of Ricoh's supplier CSR self-assessments.

Whistle-blowing

We also have in place a whistle-blowing policy which sets out the process for our employees to raise any concerns they may have in relation to compliance with our legal obligations, including in relation to modern slavery and human trafficking, and to ensure that there is adequate protection for employees who make protected disclosures or "blow the whistle".

Our due diligence processes

Ricoh Developed Products and Services

We have taken steps to identify, assess, and monitor potential areas of risk in relation to our supply chains by requiring our existing first tier suppliers of Ricoh developed products in Japan, China, and Thailand to periodically undergo CSR self-assessments. The CSR self-assessments include specific questions relating to human rights, forced labour, child labour and human trafficking. The CSR self-assessments are then used by Ricoh's procurement team in Japan to identify areas of concern that may conflict with The Ricoh Group Supplier Code of Conduct.

Based on the results of the CSR self-assessments, Ricoh classifies the risk of suppliers into three categories: high, middle, and low risk suppliers. For suppliers that are marked as high risk, Ricoh conducts interviews and discusses ways to improve their situation. Providing feedback of the CSR self-assessment to all suppliers enables our suppliers to realise their issues and work on improvement. Where a Supplier is not compliant with an area of the Ricoh Group Supplier Code of Conduct, that section of the assessment is highlighted to Ricoh and the Supplier is

informed that they must take immediate action or counter-measures to address the issue. No violations of labour laws in our supply chain have been identified as a result of our assessments done in 2017/2018.

All new suppliers of Ricoh developed products and services must complete our CSR self-assessment questionnaire early in the procurement process. It is mandatory for all new suppliers to confirm that they have read and understood The Ricoh Group Supplier Code of Conduct and that they currently comply and will continue to comply with all of Ricoh's rigorous requirements associated with social risks.

The CSR self-assessment is crucial to Ricoh's assessment of social risk in its supply chain. As such, it is part of the first step in Ricoh's critical supplier selection process and only suppliers who have conducted the CSR self-assessment may progress to the next step in the selection process.

Non-Ricoh Developed Products and Services

All potential new suppliers of non-Ricoh developed products and services must complete a supplier assessment document to give us an overview of their business. A copy of this is attached to the supplier assessment document. Suppliers are also provided with a copy of The Ricoh Group Supplier Code of Conduct.

Ricoh UK Companies regularly review all existing suppliers and require completion of an updated version of the supplier assessment document, where necessary, in order to ensure that the commitments made by existing suppliers are the same as those for new suppliers.

Training about slavery and human trafficking available to our staff

Staff within Ricoh UK Limited including the Board of Directors, the Procurement and Purchasing team, the Payroll team and the Recruitment team received in-house training about modern slavery, delivered during team meetings by Ricoh UK Limited's Head of Corporate Responsibility. The training included information and awareness about the various types of modern slavery, case law and media coverage, indicators of modern slavery practices, types of roles at higher risk of slavery, types of products and services at higher risk of slavery, and how and where to report suspected instances of modern slavery.

Assessing and managing risk

The Ricoh Group regularly takes steps to identify the area of its business and its supply chains that are most at risk in relation to modern slavery and human trafficking through its total risk management system. More information on this can be found at <https://www.ricoh.com/sustainability/society/fair/index.html#minerals>.

Human rights are categorised as a major risk area and one to which the Ricoh Group pays particular attention. In order to manage these risks Ricoh takes the steps noted above in relation to its due diligence practice with suppliers and takes steps to ensure compliance by its employees and suppliers with the policies set out above.

Ricoh also pays particular attention to human rights issues associated with obtaining minerals from conflict-affected areas and high risk areas. More information on the work we are doing to assess, manage and address this risk can be found at <https://www.ricoh.com/sustainability/society/fair/index.html>.

Our effectiveness in combating slavery and human trafficking

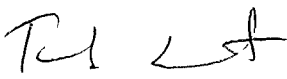
We undertake regular audits of both our suppliers and internal processes to ensure we identify any issues that need addressing. Reviews of the effectiveness of the steps we have taken this year to ensure that there is no modern slavery or human trafficking in our supply chains happen

on an ongoing basis and we intend to take the following further steps to combat the risk of slavery or human trafficking

- Continue to develop and implement internal accountability standards and procedures to hold employees and contractors accountable for non-compliance with our standards on slavery, human trafficking and forced labour
- Continue to develop and implement procedures to address violations of slavery, human trafficking and forced labour laws that are reported by our employees and contractors
- Increase awareness throughout our supply chain of supplier's responsibilities and Ricoh's expectations in relation to their standards and procedures addressing slavery, human trafficking and forced labour laws
- Continue to develop and implement effective training programs for new and continuing staff within Ricoh UK Companies on slavery, human trafficking and forced labour

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Ricoh Europe PLC, Ricoh UK Limited, Ricoh Capital Limited, Ricoh Imaging UK Limited and Ricoh UK Products Limited for the financial year ending 31 March 2019

Signed for and on behalf of all Ricoh UK Companies,



Tim Stuart, CFO, Ricoh Europe PLC

