

## Modern Slavery Act Transparency Statement

For the financial year ended 31 March 2017

Ricoh Europe PLC, Ricoh UK Limited, Ricoh Capital Limited, Ricoh Imaging UK Limited and 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 has been recognised seven times by the Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices, as one of the world's most ethical companies. Ricoh adheres to guidelines of ISO 26000 and is a proud member of the United Nations Global Compact. In Europe, Ricoh Europe PLC has been recognised continuously since 2004 by the FTSE4Good Index Series for its strong global CSR activity.

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:

*'The Ricoh Group Supplier Code of Conduct is designed to ensure our suppliers make the required efforts to establish a better working environment and society. All of our suppliers are required to comply with this Supplier Code of Conduct, which includes the protection of human rights such as the prevention of child labour and environmental conservation. We place the highest level of importance on our Supplier Code of Conduct and take the treatment of our staff, partners and suppliers very seriously.'* – Koichiro Tominaga, Executive Vice President, Ricoh Europe PLC

### Our organisational structure, our business, and our supply chains

The Ricoh Group is the leading multinational supplier of imaging and electronic products and services. 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 in which the Ricoh Group purchases from each of these areas is approximately as follows:

China	56%
Japan	34%
Thailand	7%
EU/US	3%

### *Non-Ricoh Developed Products and Services*

Procurement departments within each of the 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 Group 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. In addition to this, Ricoh Europe PLC has itself been a member of the UN Global Compact since 2008 demonstrating Ricoh's ongoing support and commitment to the development and promotion of a sustainable society.
- Ricoh Company, Ltd. is a member company of the Responsible Minerals Trade Working Group launched in May 2012 by JEITA<sup>1</sup> and the Japan Conflict Free Sourcing Working Group. Ricoh Company, Ltd has also participated in general meetings of both Working Groups regularly during 2016 and 2017.
- 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 is an active member many industrial institutions in the UK, including but not limited to the Engineers Employees Federation, Confederation of British Industry, Living Wage Foundation, and Business in the Community.
- Ricoh UK Limited formed a Supplier Engagement Committee to initiate and maintain a series of Ricoh hosted Responsible Business events for key suppliers. Each event will include a subject-specific information sharing roundtable to highlight Ricoh's commitment to Responsible Business through its suppliers. The launch event for this Committee will take place in September 2017 and the following topics will be included as part of the series agenda (among other CSR activities):
  - Anti-slavery and Human Trafficking
  - Being a living wage employer accredited by The Living Wage Foundation.

### **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/csr>. 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 Group CSR Charter](#) that sets out the corporate social responsibility action principles of the Ricoh Group globally; and

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

- [The Ricoh Group Code of Conduct](#) 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:

#### *Ricoh Europe Code of Conduct*

In addition to [The Ricoh Group Code of Conduct](#) a European Code of Conduct can be found [here](#).

#### *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 CSR page at [http://www.ricoh.com/csr/human\\_rights/](http://www.ricoh.com/csr/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 standards recognise Ricoh's CSR must be followed by Ricoh Group companies when conducting purchasing activities. Our procurement policy also requires compliance with our ethical, social, security and environmental standards which are set out in our CSR policies and our Supplier Code of Conduct.

Our relationships with suppliers are based on lawful, socially responsible, 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 2016/2017.

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. In order to assist suppliers to complete the CSR self-assessment accurately, Ricoh has developed a Supplier Guidebook which it provides to suppliers. The Supplier Guidebook provides additional detail to suppliers regarding the Ricoh Group Supplier Code of Conduct and the Ricoh Group's expectations regarding compliance.

#### *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. When completing this they must agree to adhere to Ricoh Europe's Corporate Social Responsibility Policy which is identical to [The Ricoh Group CSR Charter](#). 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 and the Supplier Guidebook.

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.

#### **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 <http://www.ricoh.com/governance/risk.html>.

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 Group 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 Group 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 <http://www.ricoh.com/csr/fair>.

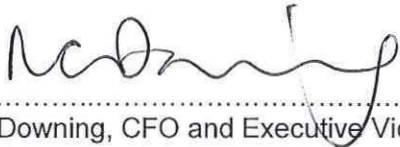
## Our effectiveness in combating slavery and human trafficking

Following a review 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, 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.

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 2017.

Signed for and on behalf of all Ricoh UK Companies,



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Nicola Downing, CFO and Executive Vice President, Ricoh Europe PLC