

## Modern Slavery Act Transparency Statement

**For the financial year ended 31 March 2023**

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 ISO26000 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 Company, Ltd. has received Gold rating in the sustainability survey conducted by [EcoVadis](#). Since receiving the first Gold rating in 2014, Ricoh has consistently received this high rating in the survey. EcoVadis assesses corporate policies, initiatives and achievements in areas concerning the Environment, Labour Practices, Fair Business Practices, and Supply Chain.
- Ricoh has been selected for inclusion in the [MSCI Japan ESG Select Leaders Index](#) and the [MSCI Japan Empowering Women Index \(WIN\)](#).
- Ricoh continues to be recognised in the [FTSE4Good Index Series](#) and the [FTSE Blossom Japan Index](#).
- Ricoh has been awarded “Prime” status in the [ESG Corporate Rating by ISS ESG](#), an investment solutions business unit of the world’s leading proxy advisory firm, Institutional Shareholder Services Inc. (ISS) of the United States.
- Ricoh has been selected as one of the 2023 Global 100 Most Sustainable Corporations in the World by Canada-based Corporate Knights.
- Ricoh has been selected as a member of the Sustainability Yearbook 2023 by S&P Global.
- Ricoh has been awarded an “A” rating as part of the CDP’s annual Supplier Engagement Rating and placed on the prestigious CDP2022 Supplier Engagement Leaderboard for the third year in a row.
- In Nov 2022 Ricoh won the second Environmental Value Award at the 4th Nikkei SDGs Management Grand Prix.

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:

### **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	34%
Japan	52%
Thailand	12%
Others	2%

### *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 several 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 JEITA<sup>1</sup> and of the Japan Conflict-Free Sourcing Working Group.
- The Ricoh Group is committed to ensuring the highest level of working conditions for its employees in the UK as well as in all 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 Company, Ltd., joined the Responsible Business Alliance ("RBA") in November 2019, the world's largest industry non-profit coalition dedicated to corporate social responsibilities ("CSR") in Global Supply Chains. The RBA sets out standards in the RBA Code of Conduct to help ensure that, in supply chains, work environments are safe, workers are treated with respect and dignity, and the manufacturing processes are responsible for their environmental impact. Ricoh complies with the RBA Code of Conduct in its business activities. Moreover, it will respect RBA's common goals and spirit and commits to adopting and implementing the RBA approach and tools. All four sites audited in 2022 have been certified by the RBA. Two sites in Japan have acquired Gold certification.

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

Further information about RBA VAP audits for Ricoh group production facilities can be found in the Due Diligence section of our Human Rights page: <https://www.ricoh.com/sustainability/society/human-rights/#dd>

## **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 Environmental, Social and Governance (ESG) responsibilities. The Ricoh Group's ESG 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 Ricoh Group Code of Conduct](#) that establishes the basic standards to ensure 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 Group's Human Rights Policy*

Ricoh Company, Ltd. has established the [Ricoh Group's Human Rights Policy](#) in accordance with the United Nations Guiding Principles on Business and Human Rights on April 7, 2021. In response to increased awareness and issues regarding human rights, including Modern Slavery, in the international community, Ricoh has established a new Human Rights Policy in line with international standards, such as the U.N. International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

In accordance with this policy, the Ricoh Group aim to contribute to the realization of a sustainable society by continuing to conduct its management in a manner that respects human rights in its business activities around the world.

### *ISO26000*

The Ricoh Group recognises ISO26000 as a reference document that provides guidance for implementation of ESG 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 ESG 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 Group Code of Conduct 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 [Ricoh Group Supplier and Partner Code of Conduct](#). Our Ricoh Group Supplier and Partner Code of Conduct is based on the Responsible Business Alliance (RBA) Code of Conduct and was comprehensively reviewed and revised in the latter part of FY2022, the latest version was published in April 2023.

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 ESG policies, ensuring, where possible (amongst other things), we:

- select suppliers that have a like-minded approach to ESG; 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.

### *Whistleblowing*

We also have in place a Whistleblowing 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, Philippines, Thailand, and United States 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 four categories: high, considerable, moderate, 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 countermeasures to address the issue. No serious violations of labour laws in our supply chain have been identified as a result of our assessments done in FY2021 and FY2022.

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**

During January/February 2020 Ricoh UK Limited was in the process of developing a training and awareness programme specifically about Modern Slavery and Human Trafficking, intended for deployment to roles within Ricoh UK with greater responsibility for – and potential exposure to encountering – Modern Slavery and Human Trafficking within our supply chain. However, due to the subsequent impact of COVID-19, this development and deployment was suspended temporarily. It is anticipated that the completion of development and subsequent deployment of this Modern Slavery and Human Trafficking training and awareness programme will resume in FY2023 and into FY2024.

During October to December 2022, Ricoh Europe created a new mandatory ESG eLearning training course, which included sections about Ricoh's Human Rights Policy and our Whistle-blowing Policy and procedure. In January 2023 this was deployed during to all 11,592 employees throughout Ricoh Europe's HQ and sales companies across the EMEA region and achieved 98.7% completion rate.

### **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>.

Human rights are categorised as a major risk area and one to which the Ricoh Group pays particular attention. 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#minerals>.

### **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 2023.

Signed for and on behalf of all Ricoh UK Companies,

*N C Downing*  
N.C.Downing (Sep.6, 2023 13:12 GMT+1).....  
Nicola Downing, CEO, Ricoh Europe PLC

# FY 23 Modern Slavery Act Statement FINAL

Final Audit Report

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