

Modern Slavery Act Transparency Statement

For the financial year ended 31 March 2026

Ricoh Europe PLC, Ricoh UK Limited, Ricoh Capital Limited, Ricoh Imaging UK Limited, Ricoh UK Products Limited, Ricoh Printing Solutions Europe (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 for its commitment to corporate social responsibility. Achievements during FY2025 included:

- Ricoh Company, Ltd. received Platinum rating for the second successive year in the sustainability survey conducted by [EcoVadis](#). Ricoh achieved an overall score of 86 out of 100 – an increase of 4 points from the previous year – with notable improvements in the Labour & Human Rights and Sustainable Procurement sections of the assessment criteria.
- Ricoh continued to be recognised in the [FTSE4Good Index Series](#) and the [FTSE JPX Blossom Japan Index](#).
- Ricoh was 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 was selected in the 2026 [Global 100 Most Sustainable Corporations](#), ranked 87th, and was the 14th time that Ricoh has featured in this listing.
- Ricoh was Selected as a member of the [Sustainability Yearbook 2026](#) by S&P Global
- [CDP2024 Supplier Engagement Leaderboard](#): Ricoh was recognised as [a CDP Supplier Engagement Leader](#) for the fifth year in a row and received a double “A” score for leadership in climate change (five years in a row) and water security (two years in a row), marking its second consecutive year achieving a double A score.

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.

In July 2024 Ricoh UK Products Limited (RPL) became part of ETRIA Co. Ltd. ETRIA is a global joint venture between Ricoh Company Ltd and Toshiba Tec Corporation, and was established on 1st July 2024. ETRIA is majority owned by Ricoh, and RPL has retained the Ricoh name.

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.

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 and environmental issues as part of its worldwide commitment to fair labour, ethical, and environmentally responsible 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.
- 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 Living Wage Foundation.
- 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.

Six Ricoh production sites hold RBA certification, see table 4 at:

<https://www.ricoh.com/sustainability/society/human-rights> Two of these production sites were audited across FY2025 and were successfully recertified by the RBA.

Further information about RBA VAP audits for Ricoh group production facilities can be found in the Due Diligence section of the Ricoh Group's Human Rights page:

<https://www.ricoh.com/sustainability/society/human-rights#section03>

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, prohibiting all forms of forced and child labour, and human trafficking on a global level to ensure consistency

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

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, and the fundamental necessity to 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

To strengthen commitments regarding human rights including Modern Slavery and child labour, Ricoh Company, Ltd. established the [Rico Group's Human Rights Policy](#) in accordance with the United Nations Guiding Principles on Business and Human Rights on April 7, 2021. The Ricoh Group Human Rights Policy is 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 [Rico Group Supplier and Partner Code of Conduct](#), and which can be found hosted within our broader Supply Chain Management webpage:

<https://www.ricoh.com/sustainability/society/scm>

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 2024.

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
- do not conduct business with 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".

In May 2020 Ricoh launched the 'Supplier & Partner hotline' for suppliers and partners relating to the Ricoh Group worldwide, to report concerns to executives and employees of the Ricoh Group companies. In early 2025, as further enhancement for all external stakeholders (e.g. suppliers, customers, local communities, etc) Ricoh launched the Responsible Business Conduct Hotline, as a reporting channel for allegations related to violations of the codes and ethics, including human rights, in the course of our business activities. Reports can be submitted via the Responsible Business Conduct Hotline website in 23 languages, and by phone from over 50 countries. Further details can be found here:

<https://www.ricoh.com/sustainability/governance/compliance#section06>

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 to periodically undergo CSR self-assessment questionnaires (SAQ System).

<https://www.ricoh.com/sustainability/society/fair>

We have introduced a SAQ System based on the RBA Code of Conduct that helps suppliers monitor their compliance with the Ricoh Group Supplier and Partner Code of Conduct. The system has been rolled out to Ricoh production sites for deployment to suppliers. The SAQ System captures suppliers' SAQ responses about their activities in labour, safety and health, environment, ethics, management systems, and living wages - the results from which are assessed by Ricoh's procurement team to identify issues to address. The results are fed back to the suppliers, who receive requests for improvement if applicable, together with corrective action plan, advice, and support in implementing a "plan, do, check, act" (PDCA) cycle by themselves to meet society's needs and expectations. If a supplier's improvement activities are not sufficient, we would discuss the future business relationship with the supplier.

Based on the results of the SAQ self-assessments, Ricoh classifies the risk of suppliers into three grades: 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 SAQ 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 and Partner 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 FY2025.

New suppliers of Ricoh developed products and services must complete our SAQ questionnaire early in the procurement process. It is mandatory for new suppliers to confirm that they have read and understood the Ricoh Group Supplier and Partner 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 and Partner 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 FY2023 Ricoh UK Limited developed training and awareness resources specifically about Modern Slavery and Human Trafficking, which were deployed to roles within Ricoh UK with greater responsibility for – and potential exposure to encountering – Modern Slavery and Human Trafficking within our supply chain. The same Modern Slavery training and awareness resources were also deployed to Ricoh UK Limited's Board of Directors.

During August to October 2025, Ricoh Europe redeployed its mandatory ESG eLearning training course to all employees throughout Ricoh Europe's HQ and sales companies across the EMEA region and achieved a 98.6% response rate. The course includes sections about Ricoh's Human Rights Policy and our Whistle-blowing Policy and procedure, and is deployed on a 2-yearly basis to all employees. The ESG eLearning course is also deployed to all new hires for mandatory completion within their first 30 days of employment.

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/scm#section03>.

Our effectiveness in combating slavery and human trafficking

We undertake regular audits of both our suppliers and our 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 enhance 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 enhance 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, Ricoh Printing Solutions Europe and Ricoh UK Products Limited for the financial year ending 31 March 2026.

Signed for and on behalf of all Ricoh UK Companies,



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David Mills, CEO, Ricoh Europe PLC

21.09.2026