



**Ricoh Group  
Code of Conduct**

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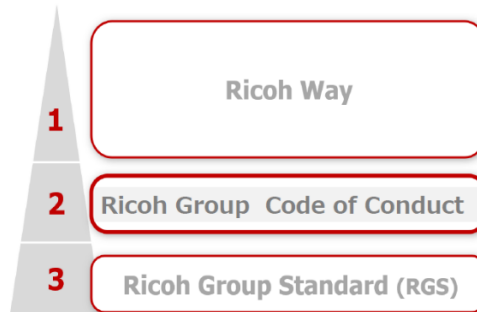
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# Introduction

Under fair and free competition, the Ricoh Group plays a role in driving the realization of a sustainable society through the creation of added value and employment useful for society and autonomous and responsible behavior. The company concept group in the Ricoh Group has a simple three-layer structure called "Ricoh Way", "Ricoh Group Code of Conduct" (hereinafter referred to as "Code of Conduct"), "Ricoh Group Standard (RGS)" to allow each officer/employee to act based on common values. In order to ensure that each and every officer and employee of the Ricoh Group practices the "Ricoh Way" and fulfills its social response, this Code of Conduct is intended to establish the norm of basic behavior of each company, Officers and Employees from the viewpoint of understanding and complying with relevant laws and regulations, international rules and their spirit and acting with high ethical standards.



## Ricoh Way

### Founding Principles

**The Spirit of Three Loves** by Kiyoshi Ichimura, Founder  
"Love your neighbor" "Love your country" "Love your work"

### Mission & Vision

At Ricoh, we empower individuals to find Fulfillment through Work  
by understanding and transforming how people work so we can unleash  
their potential and creativity to realize a sustainable future.

### Values

#### **CUSTOMER-CENTRIC**

Act from the customer's perspective

#### **PASSION**

Approach everything positively and purposefully

#### **GEMBA**

Learn and improve from the facts

#### **INNOVATION**

Break with the status quo to create value without limits

#### **TEAMWORK**

Respect all stakeholders and co-create value

#### **WINNING SPIRIT**

Succeed by embracing challenges through courage and agility

#### **ETHICS AND INTEGRITY**

Act with honesty and accountability

# 1.

## Proactive leadership of top management

- Top management shall proactively implement this Code of Conduct.
- Top management shall build effective governance systems.
- In the event of actions contrary to this Code of Conduct, top management shall take charge to resolve the situation and fulfill accountability.
- In the event of actions contrary to this Code of Conduct, top management shall impose strict disciplinary action against them, including top management itself.

Top management shall recognize that it is their role to realize the spirit of this Code of Conduct. And it shall also proactively implement this Code of Conduct and strive raise awareness of this Code of Conduct within the company and all employees to achieve its full compliance.

Top management shall conduct thorough and organized crisis management in the face of natural disasters and/or other crises.

Top management shall constantly grasp the internal and external voices and establish an effective governance system.

When a situation contrary to this Code of Conduct occurs, top management itself shall clarify both internally and externally, as applicable, that it will take charge to resolve the situation, determine the cause of infringement and make efforts to prevent similar violations in the future.

At the same time, when deemed appropriate, top management shall promptly make public disclosure, explain what has occurred, and, upon determining the source of competence and responsibility, impose strict disciplinary action against those held responsible, including top management itself.

## 2.

## Providing value beyond customer and society's expectations

The Ricoh Group will contribute to realize a sustainable society where job satisfaction and economic growth are in harmony through to solve social issues through its business activities by understanding how people work and to unleash their potential and creativity. In addition to ensuring basic quality such as legal regulations, safety, and social responsibility including security and reliability, the Ricoh Group will provide value that exceeds the expectations of employees, customers and society through our products and services.

**(1) Work to resolve customers' problems.**

Officers and Employees shall actively seek to understand the customer's problems and work to solve or ameliorate those problems, enabling transformation in working that leads to a sense of fulfillment, accomplishment, and self-actualization.

**(2) Strive to gain the trust of customers.**

Officers and Employees, in developing the products and services they provide to the customer, shall consider quality, safety, security, reliability, environmental preservation, and ease of use with diversity and inclusion in mind.

**(3) Work to improve customer satisfaction.**

Officers and Employees shall always assess the degree of customer satisfaction and shall work to improve products and services so as to achieve higher satisfaction.

**(4) Solving social issues through our business**

Officers and Employees shall recognize the world from a social perspective and shall contribute to the efforts to solve social issues through the business activities by taking advantage of behavior and skills of the individual and business resources.

**Related policies/standards:**

TQM Regulations for Ricoh Group Companies (RGS-AQMA0005)  
Quality Assurance Regulation for Ricoh Group Companies(RGS-AQMA0001)  
Product Safety Regulation for Ricoh Group Companies(RGS-AQMA0002)  
Ricoh Group Technology Ethics Charter

# 3.

## Behaviors respecting human rights

The Ricoh Group will respect the contents of the "Universal Declaration of Human Rights" and "The United Nations Guiding Principles on Business and Human Rights", aiming to create workplaces that are free of discrimination and prejudice and that take into account diversity and inclusion. These principles apply to all employment opportunities, including recruitment, education/training, evaluation, promotion, and compensation.

All suppliers and all forms of business partners of the Ricoh Group are also requested to respond in the same way as the Ricoh Group.

### 3.1 Respect for Human Rights of Stakeholders

The Ricoh Group respects the human rights of all "Stakeholders" (defined as all employees, suppliers, business partners, and customers as well as all members of the local community without exception).

The Ricoh Group prohibits the use of improper labor practices and respects the protection of the rights of young workers, freedom of association, the right to collective bargaining, and pay an appropriate wage that is at least the minimum wage or more, and which is based on a fair and just remuneration system and the individual's ability, experience, and achievements.

#### (1) Eliminate all discrimination

Officers and Employees shall respect all fundamental human rights of individuals, by taking into consideration of the laws and regulations of each country, and shall not engage in any discriminatory treatment by gender, age, nationality, race, ethnicity, ideology, creed, religion, social status, occupation or occupational status, marriage status, pregnancy status, family origin, sexual identity, gender identity, physical features, disease, disabilities, and so on.

#### (2) Work Environment

Officers and Employees shall respect diversity and inclusion, and to create a healthy and safe working environment, not take actions that hurt the dignity of individuals mentally and physically (sexual harassment, power harassment, maternity harassment, etc.) on the grounds of gender, position, official authority, etc. in the workplace.

Officers and Employees shall also properly manage working hours and respect privacy.

#### (3) Do away with improper labor practices

Officers and Employees shall prohibit all forms of forced labor, including bondage (including debt bondage), prison labor, etc., child labor, or human trafficking.

### 3.2 Human Rights Due Diligence

The Ricoh Group assesses and identifies human rights risks throughout its business activities and supply chain and any identified negative impacts on human rights are reported to top management.

The Ricoh Group will continue to implement prevention and mitigation of human rights' risks under the responsibility of management.

### 3.3 Remedy

The Ricoh Group provides a comprehensive whistleblowing system and grievance mechanism that enables the reporting of human rights concerns without fear of retaliation. If an allegation of a human rights violation is made, The Ricoh Group will promptly investigate the allegation and take timely remedial action.

**Related policies/standards:**  
Ricoch Group's Human Rights Policy  
Ricoch Group Global Diversity & Inclusion Policy  
Employment regulations

# 4.

## Pursuit of attractive work & life

The Ricoh Group will establish a workplace environment where all officers, employees and cooperators can work securely, safely and comfortably, and will promote efficient and creative workplaces.

Also, the Ricoh Group will respect diversity and inclusion and create an environment that allows all Officers and Employees to work flexibly and which is compatible with parenting, nursing care, treatment, etc.

Additionally, the Ricoh Group will continuously support career development, ability development, and skill improvement to help each and every individual to work effectively to maximize performance of individuals and teams, so that it will realize "development of the company" and "happiness of individuals".

### (1) Create secure, safe and clean workplace environment

Officers and Employees shall endeavor to prevent occupational accidents and illnesses through safety measures, prepare for emergencies, manage industrial hygiene and create a secure, safe and comfortable workplace environment.

### (2) Continue to raise the workplace environment through dialogue

Officers and Employees shall have the opportunity of consultation and dialogue, to brainstorm and exchange knowledge and ideas with each other, and carry out consultation actively and constructively in order to create a better workplace environment.

### (3) Realize work-life management with autonomous and flexible workstyles

Officers and Employees will enrich their work and enhance their lives with autonomous and flexible workstyles.



# 5.

## Conservation of the global environment

The Ricoh Group will recognize environmental conservation as its responsibility as global citizen, and with a responsibility to continuously engage in enhancing corporate values. Through environmental technology innovation and sustainable environmental management, the Ricoh Group makes the growth of our business compatible with environmental conservation, and with the participation of all employees.

### (1) Contribute to realization of a zero-carbon society

Officers and Employees are required to procure materials for raw materials and will tackle environmental load reduction activities at every stage including production stage, sales, logistics etc.

### (2) Contribute to the realization of a circular economy

Officers and Employees will globally promote thorough control of resource loss, effective use through resource circulation, and appropriate use of water resources.

### (3) Tackle environmental risk reduction activities

Officers and Employees will work on global ways to reduce the use and emission of chemical substances and ensure proper management and pollution prevention based on the concept of risk management.

### (4) Tackle nature conservation and biodiversity conservation

Officers and Employees are working to reduce the impact on biodiversity and contribute to biodiversity conservation based on the fact that they benefit from living creatures and carry out business activities while affecting nature conservation and biodiversity positively.

#### Related policies/standards:

[Ricoch Group Environmental Principles](#)

[Ricoch Group Biodiversity Policy](#)

[Ricoch Group Environmental Management Regulation \(RGS-AEPA0001\)](#)

# 6.

## Coexistence with the community

The Ricoh Group will respect the culture and customs of its country or region, considering, stakeholders' views, engage in continuous activities for priority areas set so as to contribute to society with intent and responsibility.

(1) **Respect the world's cultures and customs**

Officers and Employees shall act with the necessary respect for the history, culture and customs of the various nations and regions within which they operate.

(2) **Engage in activities that contribute to the local community**

Officers and Employees, because they want the Ricoh Group to be welcome, familiar and trusted in local society, should strive to work closely with that community, making contributions to it that will further the local culture and economy.

(3) **Foster a corporate ethos that places importance on contributions to society**

Officers and Employees should, by voluntary participation in activities, strive foster a corporate ethos that puts the proper value on social contributions.

# 7.

## Ensuring fair corporate activities

### 7.1 Free competition and fair trading

The Ricoh Group will remain in strict compliance with the laws and regulations governing the banning of monopolies, fair competition, and fair trading, and will take no action seeking to evade them.

**(1) No discussions or agreements that mutually restrict free corporate activities.**

Officers and Employees will not participate in discussions or agreements with competitors in the same industry to impose reciprocal limits on corporate freedom of action in connection with the conditions of competitive bids, product pricing, conditions of sale, profits, market share, sales areas, etc.

**(2) No exploit our trading position.**

Officers and Employees will not exploit our trading position to impose unprofitable transactions upon our trading partners, nor will we impose limitations on trading between our trading partners and third parties.

**(3) No inappropriate displays nor offer inappropriately large premiums or prizes.**

Officers and Employees shall not provide displays nor offer inappropriately large premiums or prizes that might lead customers to a mistaken choice of product.

**Related policies/standards:** Ricoh Group Basic Regulation for the Prevention of Cartels (RGS-ALAA1009)

## 7.2 Proper control of exports and imports

In order to realize security trade control and proper export/import procedures for the purpose of maintaining international peace and security, the Ricoh Group is required to comply with laws and regulations concerning export/import in the country/region (group companies in Japan in the case of "Foreign Exchange and Foreign Trade Law" and "Customs Law"), will not act against laws and regulations concerning export/import in the United States and laws concerning export/import of trading partner countries.

### (1) Applicability assessment for trading goods and technologies

Officers and Employees shall, in accordance with the internal procedures specified by company regulations, judge beforehand whether any restrictions apply to the export or import of goods (products, components, equipment, materials) or related technologies, and record the result.

### (2) Customer and trading assessment (Assessing the necessity of export/import permit)

When exporting, importing goods or providing related technologies, Officers and Employees shall confirm beforehand whether such transactions would infringe the export import relevant laws and regulations or require a permit, based on the result of the judgment of applicable restrictions and the customer and usage requirements assessment. When restrictions are found to be applicable, appropriate export/import procedures shall be followed.

### (3) Export restrictions for non-proliferation

When trading goods or related technologies, whether or not restrictions are found to be applicable, Officers and Employees shall voluntarily apply controls in the spirit of export restrictions for non-proliferation.

Officers and Employees will not conduct transactions if the goods to be traded and the technologies to be provided are used or likely to be used for diversion, development, etc. of weapons related. Also, if there is any doubt, after strict customer review and transaction review, leaving a record of the examination, whether the transaction is possible or not shall be determined by the export import control person who is prescribed by the compliance rules of the export and import related laws and regulations or the Ricoh Group Rules on compliance with Export & Import related legislation.

#### Related policies/standards:

Ricoh Group International Trade Regulation (RGS-ATRA0003)  
Ricoh Group Rules on compliance with Export & Import related legislation (RGS-ATRA0001)  
Invoice Requirements (RGS-ATRC0002)  
Country of Origin Management (RGS-ATRC0004)  
Management Standard for Export-controlled Goods (RGS-ATRC0005)

## 7.3 Promote responsible procurement

The Ricoh Group is concerned with ESG (Environment, Society, Governance) in the supply chain, and it is sound that it is working with suppliers to solve or improve those tasks in response to various problems in their respective fields. The Ricoh Group believes that it will be the driving force for development to enterprises, ultimately realize a sustainable society, and will proceed from the viewpoint of long-term improvement of corporate value.

### (1) Present procurement guidelines and request cooperation

Officers and Employees shall present to the suppliers the specific content of social responsibility they should fulfill and request their compliance.

### (2) Confirm the status of initiatives and support improvement

Officers and Employees shall confirm suppliers' compliance with the Ricoh Group Supplier and Partner Code of Conduct and the procurement guidelines and the status of their efforts by questionnaire, etc., and support the improvement of problems at suppliers as necessary.

### (3) Responsible mineral sourcing

Officers and Employees shall conduct responsible mineral sourcing within our supply chain ensuring Ricoh is not complicit in any human rights violation due to mineral mining and trading in conflict and high-risk areas.

#### **Related policies/standards:**

Ricoh Group Supplier and Partner Code of Conduct  
RicoH Groups Responsible Minerals Procurement Policy  
RicoH Group's Green Procurement Standard  
Environmentally Sensitive Chemical Substances  
Chemical Substance Management System (CMS) Guidelines

## 7.4 Limits on entertainment and gifts

The Ricoh Group, in giving entertainment or gifts, etc. will not give bribes nor depart in any other way from general good business practice.

**(1) Entertainment and gifts, etc. for public officials and government officials**

Officers and Employees may not offer, promise to give, or actually give any money, gift, entertainment or any other benefit (including a Facilitation Payment) to Public Officials or Foreign Public Officials.

**(2) Entertainment and gifts, etc. for business partners other than the above**

Officers and Employees may not offer, promise to give, or actually give any money, gift, entertainment or any other benefit to business partners, except in cases where giving such benefit is lawful under laws and regulations prohibiting corruption and bribery that are applied in the country or region concerned. If any such gift or benefit is to be offered or made it must be within the bounds of general good business practice, and prior approval must be granted by a person with decision-making authority designated by the Ricoh Group Company concerned.

**(3) Receiving of entertainment and gifts, etc.**

Officers and Employees may not accept the offer to receive any money, gift, entertainment, or any other benefit, except in cases where accepting such benefit is lawful under laws and regulations prohibiting corruption and bribery that are applied in the country or region concerned. If any such gift or benefit is to be received it must be within the bounds of general good business practice, and prior approval must be granted by a person with decision-making authority designated by the Ricoh Group Company concerned.

**Related policies/standards:** Ricoh Group Standard for Bribery Prevention (RGS-AMCA0009)

## 7.5 Comply with laws and regulations relating to dealings with public institutions and political contributions

The Ricoh Group, in doing business with public institutions, making political contributions and political campaigning, will be in compliance with the relevant laws.

### (1) Strict impartiality

Officers and Employees, when doing business with government departments or regional (local) authorities, shall comply strictly and impartially with the relevant legal requirements and regulations, always taking care to avoid legal problems.

### (2) No improper political contributions or political campaigning.

Officers and Employees, except where otherwise permitted by law, shall not in the course of business make contributions to politicians or candidates for political office, nor to political organizations, nor shall they cooperate directly or indirectly in political campaigning.

**Related policies/standards:** Ricoh Group Standard for Bribery Prevention (RGS-AMCA0009)

## 7.6 Prohibition on activities relating to Organized Crime Syndicates.

The Ricoh Group takes a firm attitude against any groups or individuals that pursue economic profits through the use of violence, threats or fraud, even those who appear lawful (“Organized Crime Syndicates”) and will have absolutely no relationship with them.

### (1) No relationship with Antisocial Forces.

Officers and Employees must have absolutely no relationship with Antisocial Forces that pose threats to the safety and order of civil society and disrupt economic activity.

### (2) Rejecting any unjustified demands from Antisocial Forces.

Officers and Employees, if presented with extortion or any unjustified demands by Antisocial Forces, shall not compromise with them by paying money or in any other way. Officers and Employees shall immediately report such demands to their superior, and the superior must contact its general administration department.

### (3) No dealings with Antisocial Forces.

Officers and Employees shall not engage in any transaction with Antisocial Forces.

## 7.7 Individual actions against the interests of the company

The Ricoh Group does not approve any actions by its officers or employees that would cause, or might threaten to cause, any disadvantage to the Ricoh Group in the performance of its normal business activities.

### (1) Inform the Company

Officers and Employees shall not take any actions that would conflict with the interests of the company, or that might lead to such a conflict of interest. When such a situation involving a conflict of interest arises, the Officers and Employees shall immediately inform their superior of the fact.

### (2) Obtain Prior Company Approval.

Officers and Employees must obtain prior company permission before accepting appointment as officers of other companies or organizations, and before entering into employment contracts.

### (3) No competing business activities without Permission.

Officers and Employees shall not, without first obtaining company permission, engage in any personal activities that would constitute competition with the Ricoh Group, nor shall they accept appointment in the management of a competitive company.

**Related policies/standards:** Employment regulations



# 8.

## Earning trust by proper information management

### 8.1 Managing corporate secrets

Information that the Ricoh Group has acquired or created in the course of business must, depending on its importance, be treated as a corporate secret and managed with all proper care. Again, the information from third parties (including customers, client companies, subordinate companies) that the Ricoh Group has collected or that has been entrusted by third parties must be similarly managed as corporate secrets.

#### (1) Obey management rules

Officers and Employees, when they have received information, materials, or documents in the course of business, should notify their supervisor, and manage them in accordance with the applicable rules of the company concerned. Again, they must continue to obey these rules even after their employment has terminated.

#### (2) Only those authorized should reveal confidential information

Officers and Employees, when they are requested to answer questions or to provide materials, whether by someone inside or outside the company, unless they clearly have the required authority to reply to the question or to provide the materials, they should refer the request to a superior for instructions.

#### (3) No private use shall be made of such information

Officers and Employees shall only use corporate secrets in the course of the company's business, and neither during their employment nor after it has terminated, shall they make any use of it for themselves or for others.

#### (4) No acquisition of information by dishonest means

Officers and Employees shall not acquire information from third parties by dishonest means.

#### (5) No use of information other than for specified purpose and conditions

When Officers and Employees acquire information from third parties in accordance with a contract, they must use it exclusively for the purpose and conditions of that contract.

#### (6) Statements on social media

Officers and Employees must comply with company rules and policies when using social media. When making comments related to the Ricoh Group as an individual, the Officer or Employee should clearly specify his/her relation with Ricoh Group and his/her statement being a personal opinion.

**Related policies/standards:**

Ricoh Group Corporate Secret Management Regulations (RGS-AGAA0001)  
ISMS Management Standards (for ISMS-SCOs) (RGS-AITC0008)  
Ricoh Group Social Media Policy (RGS-AADA0002)

## 8.2 Banning insider trading

The Ricoh Group shall not do anything that would undermine healthy and fair trading in securities market, such as taking advantage of insider information to which it gains access in the course of business to make profits.

**(1) No disclosures to third parties**

If Officers or Employees have come to know insider information in the ordinary course of business, they shall not disclose it to third parties who do not have a need to know it in the performance of their duties.

**(2) No use for personal gain**

Officers and Employees who have come to know insider information concerning the Ricoh Group or other companies either in the course of business or as a result of it, shall not trade the securities of the Ricoh Group or the other companies nor engage in any other related trades.

\* "Insider information" is unpublished information on increases (or reductions) in capitalization, agreements for business cooperation, sales figures, profits or other important internal information.

## 8.3 Proper management of personal information

The Ricoh Group properly manage and operate personal information of as customers and employees.

**(1) Handle in accordance with related laws and internal regulations**

Officers and Employees shall recognize the importance of personal information for the purpose of respecting privacy and handle personal information appropriately in accordance with relevant laws and regulations and internal rules in its collection, storage, processing, use, provision and disposal.

**Related policies/standards:** Ricoh Group Basic Policy for AI Technology Utilization

## 8.4 Protection and use of intellectual properties

The Ricoh Group will encourage activities that create intellectual properties of value to the Ricoh Group and will seek to protect and utilize them appropriately.

### (1) Rapid Notification

Intellectual properties created at work all belong to the company. Officers and Employees shall notify the company immediately of all intellectual properties created at work (with patents, this includes free patents).

### (2) Respect the rights of outside parties

Officers and Employees shall respect the rights of outside parties and ensure that, as they perform their duties, such rights are not infringed.

### (3) Follow procedures for their disclosure and provision

Officers and Employees, when announcing intellectual properties to academic conferences or disclosing and licensing intellectual properties to outside parties when implementing a new business model, shall follow both Ricoh Group policy and standard procedures before doing so.

\* The intellectual properties referred to here are patents, utility models, designs, registered trademarks, copyrights on programs, rights to use specific circuit configurations, etc.

## 8.5 Protection of corporate assets

The Ricoh Group has established rules for the control of corporate assets (products, fixtures, information, and all other assets both tangible and intangible) and these must be rigorously implemented.

### (1) Appropriate Controls

Officers and Employees must control corporate assets appropriately in strict conformity with the rules.

### (2) No Improper Use

Officers and Employees will not use any of the company's assets outside the requirements of their normal duties and will not engage in any act that would improperly obtain profits, such as diverting them for personal use.

**Related policies/standards:** [Employment regulations](#)

## 8.6 Providing proper information

The Ricoh Group will promote two-way communication with a wide range of stakeholders, and actively seek to provide proper and unbiased disclosure of corporate information.

**(1) Actively disclose information**

Accurately publicizing the Ricoh Group's corporate attitudes is the first prerequisite for deeper mutual understanding between the group and society. In order to ensure that as many people as possible have a proper understanding of the Ricoh Group, Officers and Employees must follow the normal procedures and actively provide fair and timely information.

**(2) Keep accurate records and make accurate reports**

Officers and Employees must keep accounting and financial records in compliance with the relevant laws and company regulations. Again, such records must be prepared so that their content is complete, fair, accurate, timely and readily understandable.

**Related policies/standards:** Ricoh Group Public Relations Regulation (RGS-APRA0001)

## Consultation and reporting regarding concerns and questions about the Code of Conduct

Officers and Employees will report to their superiors and relevant departments if they become aware of any violation or potential violation of the Code of Conduct. If it is difficult to report to their superiors and relevant departments, Officers and Employees shall instead report to the Ricoh Group Whistleblowing System or the consultation desk of each company. Officers and Employees will not treat anyone disadvantageously because they have made a report in good faith or cooperated with an investigation.

**Related policies/standards:** Ricoh Group Whistleblowing System (RGS-AMCA0005)

## Others (definitions, administration)

### Definitions

The definitions of the terms used in this Code of Conduct are as follows:

1. "Ricoh" refers to Ricoh Company, Ltd.
2. "Ricoh Group" refers to Ricoh and consolidated Group Companies.
3. "Ricoh Group Companies" refers to individual companies in the Ricoh Group.
4. "Officers and Employees" refers to directors, auditors, executive officers, board members, all those coming under the regulations governing employment and all others employed in any capacity (whether in part time or temporary employment).

### Administration

Administration of this Code of Conduct is defined by the relevant Ricoh Group Standard. When carrying out daily work, Officers and Employees act in accordance with the relevant policies and Ricoh Group Standards for each item, as well as each company's standards and rules.

## Ricoh Group Code of Conduct

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ESG Strategy Division  
RICOH COMPANY, LTD.

3-6, Nakamagome 1-chome, Ohta-ku,  
Tokyo 143-8555

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