Ricoh Group Supplier Code of Conduct

The Ricoh Group, to grow as a respected enterprise and fully discharge its corporate social responsibility (CSR) from a consistent global perspective and throughout every aspect of its operations, established the Ricoh Group CSR Charter and Code of Conduct under the principles on "Integrity in Corporate Activities", "Harmony with the Environment", "Respect for People" and "Harmony with Society", which are to be observed, with the proper social awareness and understanding, compliant with both the letter and the spirit of national laws and the rules of international conduct.

Based on the above-mentioned, we established this Code of Conduct for our suppliers to understand the concept of Ricoh Group's CSR and make efforts to aim at the better society and global environment and sustainable development of society.

Accordingly, we would like to make a request to our suppliers for observing the following items. In particular, the "required" items are regarded as the laws and regulations matters or the most important matters that the Ricoh Group recognizes, and we will check the implementation status by supplier self-assessment.

1 Providing customer-oriented products

1) Ensure product safety

Suppliers are required to satisfy safety standards defined by laws and regulations for products, when they develop/design them on their own responsibility.

2) Quality assurance system

Suppliers are requested to establish and implement a quality assurance system (ISO9000 series or other equivalent quality assurance system).

2 Free competition and fair trading

1) Prohibit impediment to free competition

Suppliers are required not to impede fair, transparent, and free competition.

2) Prohibit abuse of a superior position

Suppliers are required not to create a disadvantage for their suppliers by abuse of a superior position.

3 Managing corporate secrets

1) Prevent the leakage of customer and third-party confidential information

Suppliers are required to control and protect appropriately their own confidential information, collected confidential information collected from customers and third parties, and confidential information deposited from customers and third parties.

2) Prevent the leakage of personal information

Suppliers are required to appropriately control and protect personal information of

employees, customers, and third parties.

3) <u>Secure computer networks against threats</u>

Suppliers are requested to take protective action against threats on the computer network, and to prevent damage to their company and others.

4 Limits on entertainment and gifts

Suppliers are required not to offer and/or to receive inappropriate benefits to/from stakeholders in business relations.

5 Strict control of exports and imports

Suppliers are required to streamline a clear-cut control system and execute proper export and import procedures, regarding exports and imports of goods or their related technologies defined by laws and regulations.

6 Protection and use of intellectual properties

Suppliers are required to respect and not to infringe upon intellectual property rights.

7 Participation in anti-social actions

Suppliers are required to have absolutely nothing to do with anti-social activities and elements that pose threats to the safety and good order of society and the lives of its citizens.

8 Responsible sourcing of minerals

Suppliers are requested not to procure or use the raw materials, components, products, etc. which include tin, tantalum, tungsten, their ores or mineral derivatives, or gold that are produced illegally in conflict-affected and high-risk areas, in order to avoid complicity of human rights abuses or environmental destruction, etc. in those areas. Suppliers are requested to implement appropriate measures for the responsible sourcing of minerals.

9 Protection of corporate assets

1) Detect injustice promptly

Suppliers are requested to perform activities to prevent improper acts, and to streamline a system to discover and to respond to improper acts at an early stage.

2) Procurement risk management

Suppliers are requested to daily and systematically perform activities for risk management to maintain stable supply of products.

10 Respecting the global environment

1) Control hazardous chemicals in products

Suppliers are required to observe laws and regulations relating to control of chemical

substances (contained in products), including laws and regulations and indication regulations which relate to chemicals control that Ricoh Group demands, and to implement the requirements defined in the authorization system when the Ricoh Group judges CMS (a chemical substance system of administration) construction is needed.

2) Control hazardous chemicals in manufacturing

Suppliers are required to control chemical substances (used in manufacturing processes) as defined by local laws and regulations. Suppliers are requested not to use chlorinated organic washing materials in manufacturing processes.

3) Environmental management system

Suppliers are required to establish and implement an environmental management system (ISO14001, eco action 21, etc. or equivalent Ricoh guidebook).

4) Minimize environmental pollution (water, soil, air)

Suppliers are required to be in compliance with local laws and regulations of drainage, sludge and air emissions and to reduce such environmental pollution by voluntary criteria as needed.

5) Obtain environmental permits

Suppliers are required to obtain necessary environmental permits as defined by local laws and regulations, and to submit necessary reports to the government.

6) <u>Promote resource and energy saving by reusing, reducing, and recycling (3R)</u> Suppliers are requested to define a voluntary goal of natural resources and energy saving, and to implement continuous activities for efficient usage (Reduce, Reuse, and Recycle).

7) Promote green-house gas reduction

Suppliers are requested to define voluntary goals for green-house gas (carbon dioxide, methane, nitrogen dioxide, HFC, PFC, and SF6) reduction, and to implement continuous activities for further reduction.

8) Promote waste reduction

Suppliers are requested to define voluntary goals for waste reduction, and to implement continuous activities for further reduction.

9) Disclose environmental preservation activities

Suppliers are requested to positively disclose outcomes of environmental activities.

10) Conservation of biodiversity

Suppliers are requested to conduct business activities (procurement, etc.) in positive consideration of biodiversity.

11 Respect for human rights

1) Prohibit forced labor

Suppliers are required to employ all employees on a voluntary basis, and not to practice forced labor.

2) Prohibit inhumane treatment and infringements of human rights

Suppliers are required to prohibit harsh and inhumane treatment such as maltreatment and/or harassment and to respect human rights of employees.

3) Prohibit child labor

Suppliers are required not to employ children who are under the minimum labor age and not to assign such jobs.

4) Prohibit discrimination

Suppliers are required to prohibit discrimination during the process of job offering and hiring, and to work toward the equal opportunity and fairness of treatment.

5) Pay appropriate wages

Suppliers are required to pay the legal minimum wage or more, and not to practice unfair wage deduction as a means of disciplinary action.

6) Regulate working hours

Suppliers are required to regulate employee's working hours/holidays/vacations so as not to exceed the legal ceiling.

7) Apply safety measures for equipment and instruments

Suppliers are requested to apply appropriate safety measures for equipment and instruments used in their company.

8) Promote safe activities in the workplace

Suppliers are requested to evaluate their own safety risks and to ensure safety in the workplace with appropriate designs, techniques, and control methods.

9) Promote hygiene in the workplace

Suppliers are requested to be aware of the conditions in the workplace related to biological and chemical harm, noise, and odor, that are harmful to health, and to take appropriate measures.

10) Apply appropriate measures for occupational injuries and illnesses

Suppliers are requested to be aware of the situation of occupational injuries and illnesses in the workplace, and to take appropriate measures.

11) Properly manage disasters and accidents

Suppliers are requested to prepare emergency response measures for possible disasters and accidents in order to protect human lives, and to inform people in the workplace.

12) Be careful about physically demanding work

Suppliers are requested to define physically demanding work, and to control it appropriately to prevent injury and illness.

13) Promote safety and hygiene in all company facilities

Suppliers are requested to maintain appropriate safety and hygiene in all employee living facilities provided by the company (e.g., dormitory, canteen, restroom).

14) Promote health maintenance programs for employees

Suppliers are requested to provide appropriate health maintenance programs for all employees.

12 Practical contributions to society

Suppliers are expected to practice proactive voluntary activities to contribute to the development of global society and the local community.

13 Harmonizing with society

1) Provide accurate information on products and services

Suppliers are requested to provide accurate information on products and services to consumers and customers.

2) Disclose appropriate company information

Suppliers are requested to positively disclose company information for stakeholders, regardless of legal obligation.

- Effective January 1, 2006

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