

RICOH
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**Ricoh Australia
Modern Slavery
Statement
2021/22**



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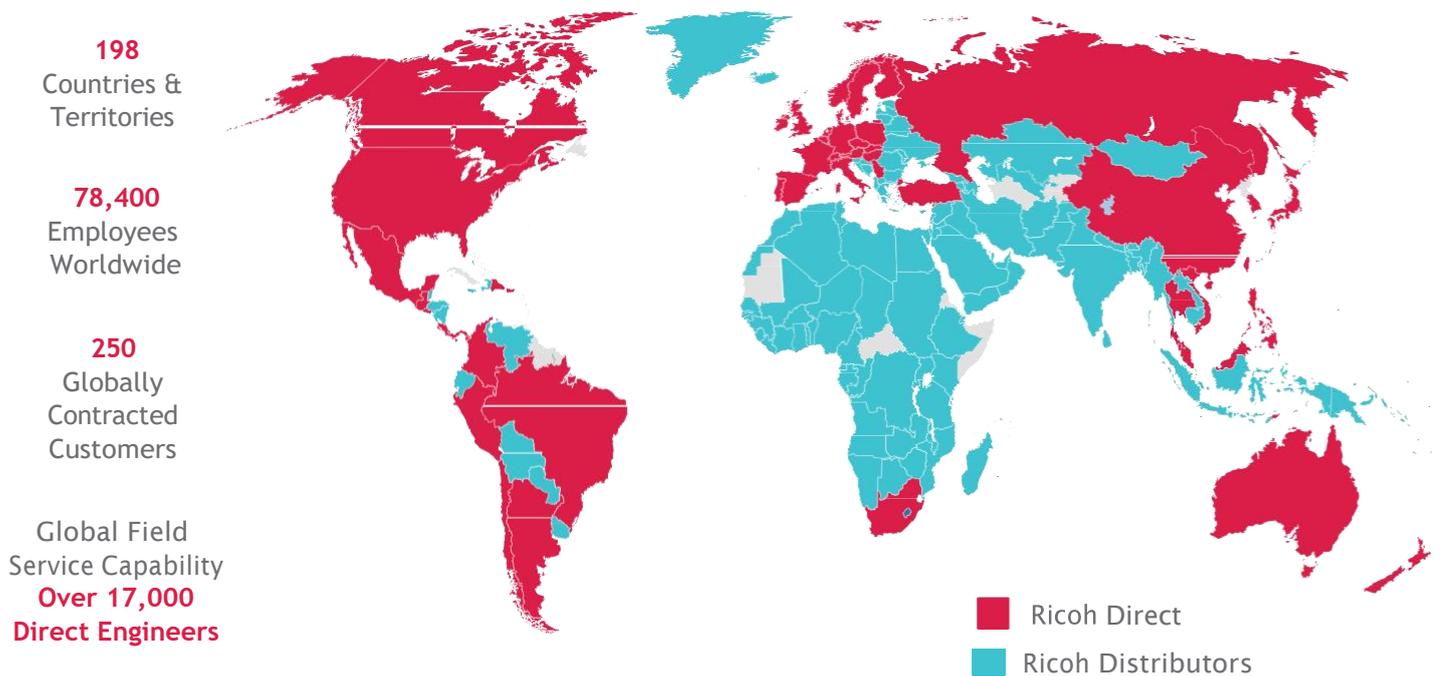
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About Ricoh

Ricoh is empowering digital workplaces using innovative technologies and services that enable individuals to work smarter from anywhere. In Australia, Ricoh is a leading provider of document management solutions, IT services, communications services, and commercial and industrial printing.

Ricoh Australia Pty Ltd (ACN 000 593 171) (**Ricoh Australia**) was incorporated in New South Wales and our registered address and principal place of business is Suite 1G, 2 Richardson Place, North Ryde, NSW 2113. Ricoh Australia operates branches in seven states/territories within Australia and has a main distribution centre located at Eastern Creek, NSW. Ricoh Australia is a wholly owned and controlled entity of Ricoh Asia Pacific Operations Ltd (**RAPO**), a company incorporated in Hong Kong. Ricoh Australia's ultimate holding company is Ricoh Company, Ltd. (**Ricoh**) which has its head office in Tokyo, Japan and is listed on the Tokyo Stock Exchange. The Ricoh group of companies (**Ricoh Group**) operate in almost 200 countries and regions worldwide and each group company sources goods both locally and abroad. The Ricoh Group together employs approximately 78,400 people.

Our global reach





Ricoh Way

Ricoh Way is our corporate philosophy and is our essential guide to each daily decision and activity.

Founding Principles

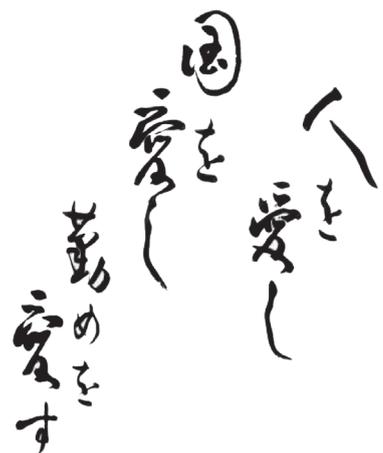
The Spirit of Three Loves, by Kiyoshi Ichimura, founder.

“Love your neighbor”

“Love your country”

“Love your work”

Kiyoshi Ishimura formulated the Ricoh Group’s Founding Principles in 1946. They inform how we do business, encouraging us to constantly improve and contribute to the wellbeing of all stakeholders, including our families, customers, suppliers and society at large.





Our approach

The Ricoh Group is committed to upholding human rights and the achievement of the United Nations Sustainable Development Goals (SDGs) through its business activities.

At Ricoh respect for human rights is a fundamental corporate value. Beyond meeting regulatory requirements and social expectations in countries and regions in which we operate, we are committed to achieving the highest standards of ethical behaviour in the conduct of our business. To that end, Ricoh has made a firm commitment to human rights by proactively implementing international standards enunciated in the United Nations Global Compact and ISO 2600.

As well as maintaining close value-based relationships with our suppliers, Ricoh's worldwide commitment to human rights and fair labour practices within the global Ricoh Supply Chain is evidenced by the following:

- 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 its operations.
- Ricoh Company, Ltd. is a member company of the Responsible Minerals Trade Working Group, launched in May 2012 by the Japan Electronics and Information Technology Industries Association and the Japan Conflict-Free Sourcing Working Group. In 2017-2018, Ricoh Company Ltd participated in general meetings of both Working Groups.
- Ricoh Company, Ltd. is a member of the Responsible Business Alliance (RBA), the world's largest non-profit collaboration 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 is strongly committed to RBA's common goals and spirit and will continue to adopt and implement the RBA approach.

As a result of these efforts, Ricoh has been recognised for its corporate social responsibility:

- Ricoh Company, Ltd. has received the highest Gold rating in the sustainability survey conducted by EcoVadis. Ricoh has consistently received the highest rating in the survey for the past eight consecutive years. EcoVadis assesses corporate policies, initiatives and achievements in areas concerning Environmental, Labour Practices, Fair Business Practices and Supply Chains. Ricoh received high praise in Sustainable Procurement in the 2021 assessment.
- In March 2022, Ricoh Company, Ltd. has again been awarded a Gold rating in the sustainability survey conducted by EcoVadis. This recognition places Ricoh amongst the top 5% of companies assessed in its industry in terms of sustainability performance.
- Ricoh continues to be recognised in the FTSE4Good Index Series and FTSE Blossom Japan Index.
- Ricoh was awarded Bronze Class in sustainability ratings of RobecoSAM, a basis for inclusion in Asia Pacific Index of Dow Jones Sustainability Indexes.

Our operations and supply chain

Ricoh Australia operates directly in all states and territories within Australia. We have a wide network of metropolitan, regional and remote independent dealerships. The dealerships distribute and sell Ricoh products and services, in addition to being Ricoh Australia subcontractors for the delivery of services to our direct customers.

Ricoh developed Products and Services

Ricoh Australia obtains Ricoh developed products and services from its parent company, Ricoh Asia Pacific Operations, Ltd (RAPO). RAPO is based in Hong Kong and is the centralised distributor of Ricoh products designed, developed and produced by Ricoh companies in China, Japan and Thailand. Our first-tier suppliers for these products are also in these countries. 53% of Ricoh Group suppliers are located in Japan, 37% in China, 9% in Thailand and 1% in other locations globally.

Non-Ricoh developed Products and Services

In addition to selling its own proprietary products and services, Ricoh resells several products and services developed by third parties (Third Party Products and Services). Ricoh Australia sources Third Party Products and Services both locally and through global, group-wide supply agreements. Procurement specialists within relevant divisions of Ricoh Australia source and manage suppliers of Third Party Products and Services.

Our local reach



Modern slavery risks in our operations and supply chain

The Ricoh Group takes steps to identify the areas of its business and its supply chains that are most at risk in relation to modern slavery and human trafficking through its Group Risk Management Framework. Ricoh Australia has identified the following key modern slavery risks in its operations and supply chain:

- Human rights violations – Ricoh Australia recognises that human rights violations may occur in the Ricoh Group’s supply chains overseas as well as in Ricoh Australia’s local supply chains.
- Forced labour and child labour – Ricoh Australia is aware that there is a risk that the production of Ricoh products in countries outside Australia may involve the use of forced labour and child labour.
- Sourcing of conflict minerals – Ricoh Australia recognises that the Ricoh Group’s production processes may involve procurement of minerals from states in conflict areas and other high-risk areas, which in turn give rise to potential for human rights abuses, underpayment of workers, and other labour abuses.

Actions to assess and address modern slavery risks

The Ricoh Group

The Ricoh Group has implemented various mechanisms to assess and address modern slavery risks.

Implementation of Periodic Assessment for Ricoh Group Production Sites

- The Ricoh Group recognises that the human rights risk at production sites is of high importance, and continuously monitors it.
- In 2019, we joined the Responsible Business Alliance (RBA), a corporate alliance that promotes corporate social responsibility in global supply chains. In 2020, we conducted a risk assessment using the RBA SAQ for major production sites of the Ricoh Group.
- In 2022, we started annual risk assessments and conducted them at 21 production sites.

Continuous RBA VAP audits

- Among the production sites that have implemented the RBA SAQ, major production sites evaluate the effectiveness of preventive and mitigating measures and corrective measures through the continuation of the third-party audit (RBA VAP) every two years. Through the audits conducted between 2020 and 2021, we confirmed that there were no serious human rights-related non-conformances, and all audited sites have been certified by the RBA. [Table A] At the three sites that have conducted the VAP, they have formulated an improvement plan regarding non-conformances with RBA’s compliance requirements, and are working toward improvement.
- We plan to expand third-party audits to other major production sites. We will continue to conduct on-site audits at necessary sites and monitor the effectiveness of countermeasures against human rights risks.

[Table A] RBA certification status

Facility name	Country of Location	The latest Time for auditing	Score (out of 200 points)	Recognition level	Certification deadline
Ricoh Industry Tohoku Plant	Japan	May 2022	189.6	Gold	June 2024
Shanghai Ricoh Digital Equipment Co., Ltd.	China	April 2021	168.0	Silver	September 2022
Ricoh Manufacturing (Thailand) Ltd.	Thailand	April 2021	173.8	Silver	April 2023

Implementation of Assessment for Suppliers

- In order to ascertain human rights risks in the supply chain, we conduct CSR assessments including the assessment of human rights risks every year with a focus on major suppliers in target areas. We will conduct onsite audits to the supplier whose result of the assessments have showed high-risk and request to improve findings. In 2020, we reviewed the content of CSR assessments and conducted assessments in accordance with RBA standards and investigated human rights risks at our major suppliers, who account for more than 80% of our purchases, and investigated human rights risks.
- In the 2021 survey, no supplier was identified as high risk in the human rights category in the CSR assessment, but there were some concerns about a human rights risk in some supplier, so we requested to improve the risk issues. The CSR assessment will be reviewed and monitoring of human rights risks at suppliers will be strengthened.



Major international standards and regulations implemented by the Ricoh Group

- Universal Declaration of Human Rights
- The 10 Principles of the United Nations Global Compact (Recognised as an Advanced Level)
- Human Rights Guidelines based on the United Nations Guiding Principles on Business and Human Rights (the Ruggie Framework)
- Children's Rights and Business Principles
- ISO 26000 (Social Responsibility Standard)
- OECD Guidelines for Multinational Enterprises
- ILO International Labour Standards

Ricoh Group Policies and Procedures

Ricoh Group has developed and implemented global policies to combat modern slavery and human trafficking, and to ensure consistency throughout its operations.

Ricoh Business Conduct Guidelines and the Ricoh Supplier Code of Conduct

The Ricoh Business Conduct Guidelines establish the basic standards to ensure that all companies, executives and employees of the Ricoh Group, when engaging in corporate activities, act in accordance with social ethics and applicable laws.

Ricoh Group is a member of the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. In August 2020 Ricoh released a revised Supplier Code of Conduct incorporating the RBA Code of Conduct. Ricoh Group's Supplier Code of Conduct takes a strong stance on human rights violations including forced and child labour, environmental compliance, and strict import and export controls. By agreeing to comply with the revised Supplier Code of Conduct, Ricoh Group ensures its suppliers are working in tandem to operate in accordance with the code and all laws and regulations that require them to treat workers fairly and provide a safe and healthy work environment.

Ricoh Group's procurement team in Japan is responsible for ensuring all Ricoh developed products and services meet the requirements of the Ricoh Group Supplier Code of Conduct and all business activities are carried out in accordance with Ricoh Group's Business Conduct Guidelines.

Ricoh Group Whistle-blower Policy

Ricoh Group has in place a Whistle-blower 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.

Addressing human rights issues

Risks associated with human rights are an emerging supply chain management issue. To deal with this concern, Ricoh Group insists that its suppliers comply with the Ricoh Group Supplier Code of Conduct. This includes the prohibition of human rights abuses, such as child labour and forced labour. Ricoh Group monitors compliance through a periodical CSR Self-Assessment Program and by requesting improvement as necessary.



Addressing child labour issues

Child labour is one of the priority issues of Ricoh Group's Total Risk Management efforts, and relevant departments have been engaged in various projects to address child labour issues. The Ricoh Group has surveyed the compliance with labour laws by our manufacturing sites worldwide. Survey results confirmed there have been no violations in the reporting period. CSR self-assessments have confirmed no reports of child labour violations within our tier-one suppliers.

Addressing the conflict minerals issue

With regard to the responsible supply chain management of minerals from conflict-affected areas and high-risk areas, in order that companies respect human rights and avoid contributing to conflict through their mineral sourcing practices, it is expected to cultivate transparent mineral supply chains and companies' sustainable growth by the righteous decision-making on the mineral resource procurement with a view to enabling countries to benefit from their natural mineral resources and preventing the extraction and trade of minerals from becoming a source of conflict, human rights abuses, and insecurity.

Ricoh Group's Responsible Minerals Procurement Policy

Previously, the Ricoh Group Supplier Code of Conduct incorporated responsible sourcing of minerals. Due to growing public attention, the Ricoh Group addressed these concerns and established "Ricoh Group's Responsible Minerals Procurement Policy" and views the issues that the minerals mining or trading in conflict-affected and high-risk areas finances armed groups and fosters conflicts, or closely related to human rights abuses, labour issues or environmental destruction, etc. as an important social issue, and continues to secure transparency in the supply chain together with its business partners, also ensures responsible mineral sourcing practices.

Monitoring risks through the conflict minerals survey

The Ricoh Group addresses conflict minerals issue referring to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and conducts an annual

conflict minerals survey targeting suppliers of raw materials and components to be used in the production of Ricoh Group products. As a result of this work, Ricoh has identified that its toner products are conflict-free.

Conflict Minerals Survey - Fiscal 2021 and future efforts...

In the 2020 reporting period, Ricoh Group's Conflict Minerals Survey was completed by 94% of suppliers. Upon analysis, it was confirmed there was a possibility that some products contain parts or materials which originate in the Democratic Republic of Congo or an adjoining country. Accordingly, we conducted due diligence on our relevant first-tier suppliers. In fiscal year 2021, the survey identified 229 smelters and refiners have acquired the certification of Responsible Minerals Assurance Process (RMAP), compared to 228 smelters in fiscal year 2020.

In 2020, Ricoh had expanded the list of conflict minerals surveyed to incorporate the use of cobalt in products or parts supplied by major suppliers. The survey identified that 26% of the 35 cobalt smelters and refineries have acquired the certification of Responsible Minerals Assurance Process (RMAP). In 2021, the survey identified that 48% of the 63 cobalt smelters and refineries had acquired RMAP certification and are conflict free.

	FY2019	FY2020	FY2021				
			Total	Gold	Tantal	Tin	Tungsten
Number of smelters & refiners	497	300	332	171	35	78	48
Number of RMAP conformant smelters & refiners (Conflict-Free)	271	228	229	99	35	54	41
Number of RMAP Active* ⁵ smelters & refiners	—	12	18	7	0	7	4
Number of other RMI smelters & refiners* ⁶	—	60	85	65	0	17	3
Rate of RMAP conformant smelters & refiners (Conflict-Free)	55%	76%	69%	58%	100%	69%	85%
Response rate from suppliers	93%	94%	95%	—	—	—	—

	Cobalt	
	FY2020* ⁷	FY2021
Number of smelters & refiners	35	63
Number of RMAP conformant smelters & refiners (Conflict-Free)	9	30
Number of RMAP Active smelters & refiners	—	10
Number of other RMI smelters & refiners	—	23
Rate of RMAP conformant smelters & refiners (Conflict-Free)	26%	48%
Response rate from suppliers	85%	95%

*⁵ RMAP Active: Smelters & refineries under RMAP audit or are going to be audited.

*⁶ other RMI smelters & refiners: RMI certified smelters & refiners other than RMAP Conformant / Active.

*⁷ Cobalt Survey In fiscal 2020, we conduct a trial survey of a limited number of suppliers.

Ricoh Australia

Ricoh Australia has implemented the following mechanisms to assess and address modern slavery risks:

- The Executive Leadership Team (ELT) is now responsible for ensuring compliance with the Ricoh Business Conduct Guidelines. The Managing Director, the General Counsel and the People & Purpose Manager are responsible for investigating and managing the risk of modern slavery in the local business and supply chains; and ensuring that local employment and work health and safety laws are met.
- We are continuously improving our local sourcing practices and embedding the Ricoh Supplier Code of Conduct in our approach to procurement, including consulting, sharing and seeking ethical sourcing commitments from local suppliers.
- We have formulated a modern slavery Supplier Questionnaire for domestic third-party suppliers of products and services. We have decided to target a higher risk area of third-party electronic products. We will continue to submit our Supplier Questionnaire to our top suppliers of these products by expenditure.
- We have updated many of our standard form supplier contracts by incorporating clauses imposing appropriate modern slavery obligations on our suppliers.
- Modern slavery training has been deployed as part of the compliance training program for all Ricoh Australia employees involved in procurement. Mandatory employee training on Ricoh Business Conduct Guidelines is undertaken as part of Ricoh Australia's suite of Induction Training courses. Refresher training is undertaken annually as part of Ricoh Australia's mandatory compliance training program. All records of completed training are held within Ricoh Australia's Learning Management System.
- We have updated our local Whistle-blower Policy.

Measuring the effectiveness of our actions

GEMBA – learning and improving from facts – is a core value of the Ricoh Way.

The Ricoh Group

The Ricoh Group continues to identify, assess, and monitor potential areas of risk of modern slavery in our supply chain by requiring our first-tier suppliers of Ricoh developed products to periodically undergo CSR self-assessments. The CSR self-assessments seek to assess supplier compliance with the Ricoh Group Supplier Code of Conduct, and include specific questions relating to human rights, forced labour, child labour and human trafficking. The CSR self-assessments are used by Ricoh’s procurement team in Japan to identify and assess modern slavery risks.

Based on the results of 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. Where a supplier is not compliant with a specific area of the Ricoh Group Supplier Code of Conduct, that section of the assessment is highlighted to the supplier, and they are informed they must take immediate action or implement countermeasures to address the issue.

All potential new suppliers of Ricoh developed products and services must complete our CSR self-assessment questionnaire early in the procurement process and will not progress through the procurement process if they fail to complete the questionnaire or if their assessment indicates that they are unable to adequately satisfy the requirements of the Supplier Code of Conduct. It is mandatory for all new suppliers to confirm they have read and understood the Ricoh Group Supplier Code of Conduct and that they currently comply and will continue to comply with the code.

Each year, Ricoh’s Global Procurement Division is required to meet a number of Key Performance Indicators, which are designed to ensure ongoing implementation of the CSR self-assessments, and to year on year, increase the number of third-party audits in Thailand and China during the reporting period for high-risk suppliers. Due to COVID-19 desktop audits of RBA-compliant CSR self-assessments were undertaken in place of site audits during the reporting period (1 April 2020 to 31 March 2021). These audits revealed no risks of modern slavery.

From 2020 onwards, CSR assessments are carried out on global suppliers, mainly in China, Thailand and Japan, in accordance with RBA standards to determine supplier risks, and improvement plans are formulated, and improvement activities are carried out for those suppliers where improvement issues are identified.



Looking ahead

Ricoh Australia will continue to assess the efficacy of consultation, policy and action in identifying and addressing modern slavery risks in our operations and supply chains.

Our short-term goals are to:

- Adopt Ricoh Group's Supplier Code of Conduct across the local supply chain;
- Adopt Ricoh Group's Responsible Minerals Procurement Policy;
- Identify other suppliers in the business who may be in high risk areas of modern slavery including cleaning companies servicing our Branch Offices and Warehouses and Ricoh's Dealerships;
- Establish a process to review actions taken and start to develop some KPIs to assess the effectiveness of the modern slavery program;
- Implement an internal audit procedure to check our modern slavery program is being followed correctly.

Our mid-term goals are to:

- Regularly check risk assessment processes across the Australian business;
- Establish a process for regular engagement and feedback between key areas of the business e.g. Sourcing, Legal and People & Purpose;
- Develop and publish procurement guidelines that address the requirement to continuously improve measuring and monitoring of modern slavery risks.

Consultation and approval

The foregoing statement is made pursuant to s.13 of the Modern Slavery Act 2018 (Cth) and in compliance with s.16 of that Act and constitutes the Modern Slavery Statement for Ricoh Australia Pty Ltd for the financial year ending 31 March 2022.

Ricoh Australia Pty Ltd does not own or control any entities. Ricoh Company Ltd, our ultimate parent, plays a crucial role in our supply chains as the principal manufacturer of Ricoh developed products and services.

Approved on 23 September 2022 by the Board of Directors of Ricoh Australia Pty Ltd and signed by:

Yasu Takahashi

[Yasu Takahashi \(Sep 30, 2022 14:33 GMT+10\)](#)

Yasushi Takahashi
Managing Director
Ricoh Australia Pty Ltd

2022_21 Ricoh Australia Modern Slavery Statement_Draft v4 for execution

Final Audit Report

2022-09-30

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