

**Ricoh Australia  
Modern Slavery  
Statement  
2023/24**



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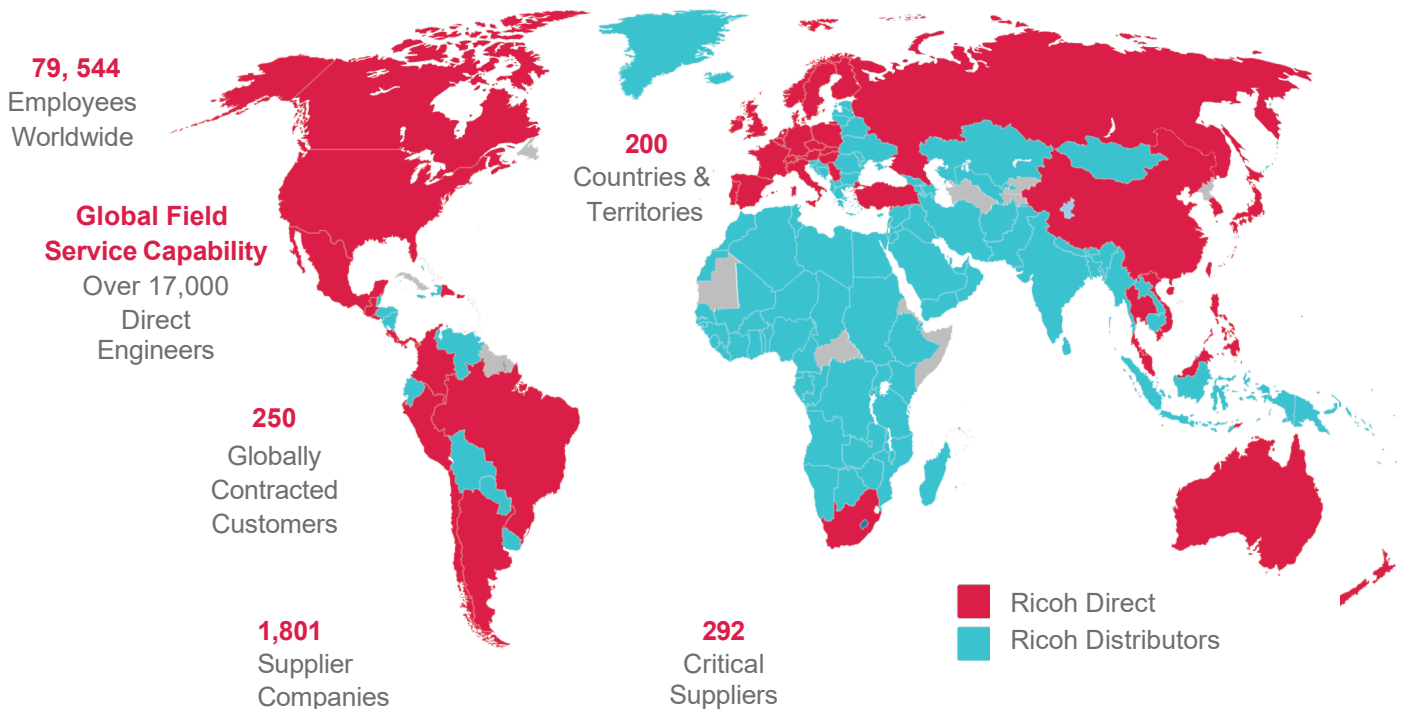
## About Ricoh

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 Level 1, 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 companies (Ricoh Group) operate in almost 200 countries and regions worldwide, consists of 240 companies (as at 31 March 2024), and each group company sources goods both locally and abroad. The Ricoh Group together employs approximately 79,544.

The Ricoh Group pursues sustainability through a Three Ps Balance—Prosperity (economic activities), People (society), and Planet (environment). Based on this, we have set ESG targets referred to as “Future Financial Targets.” We believe that all of our business contributes to the creation of a sustainable society and ultimately enhances our future financial achievement.

### Our global reach





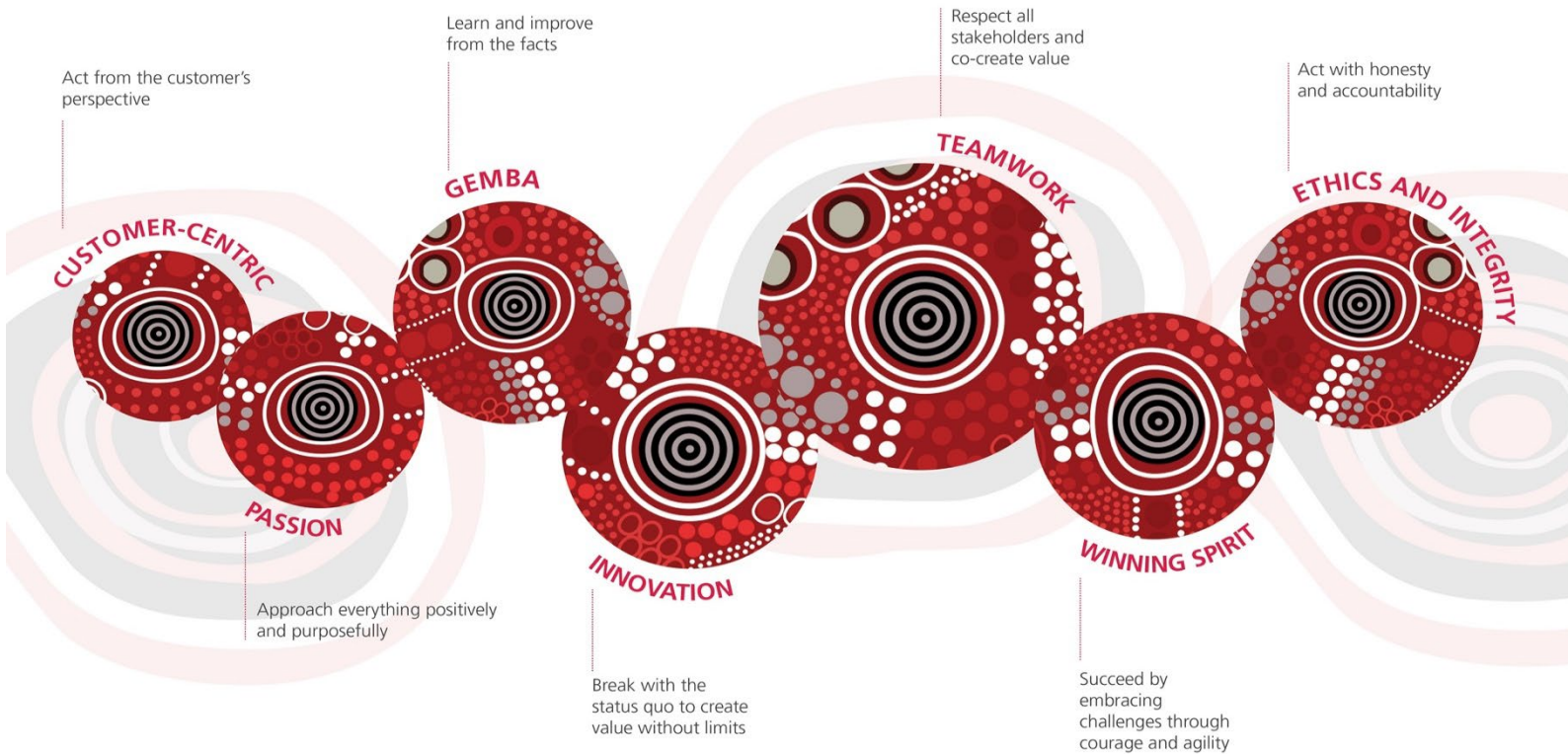
## Our approach

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

Human rights are fundamental rights that all people are entitled to, and the extent of that entitlement should be extremely deep and wide. The concept of human rights is now a fundamental international social issue that must be addressed by all companies wherever they operate. The global community expects companies to operate with due respect for the human rights of all people based on this basic concept.

The origin of Ricoh's respect for human rights lies in one of the Founding Principles —“Love your neighbour”— of our corporate philosophy, which is known as “the Spirit of Three Loves”. Not only do we meet all the regulatory requirements and social expectations in the countries and regions in which we operate, but we also demonstrate our commitment to human rights by following international standards such as the “International Bill of Human Rights” and the “ILO Declaration on Fundamental Principles and Rights at Work”. Furthermore, as a signatory to the United Nations Global Compact, we support “The Ten Principles of the United Nations Global Compact” and ISO 2600. We firmly believe that we enhance our corporate value by respecting the human rights of all people involved in the Ricoh Group's business activities and by avoiding risks of human rights violations.

## Values



### Ricoh's Vision for Reconciliation

Ricoh's vision for reconciliation is to develop meaningful and respectful partnerships with Aboriginal and Torres Strait Islander peoples.

Ricoh Australia commissioned the artwork *Buruwi Buyi* (Three Spirits) by Ngamba artist Trevor Eastwood to reflect their commitment to reconciliation. The artwork embodies Ricoh's founding principles, represented by three concentric circles.

### 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 neighbour"

"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 well-being of all stakeholders, including our families, customers, suppliers and society at large.



## Think Global, Act Local – Ricoh Australia

In the spirit of the Ricoh Group values and commitment to human rights Ricoh Australia has implemented the following mechanisms to assess and address modern slavery risks:

- The Executive Leadership Team (ELT) is responsible for ensuring compliance with the Ricoh Business Conduct Guidelines. The Managing Director 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.
- A modern slavery Supplier Questionnaire for domestic third-party suppliers of products and services is utilised by Ricoh. 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 is 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 Whistleblower Policy.

## Our local reach



## 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

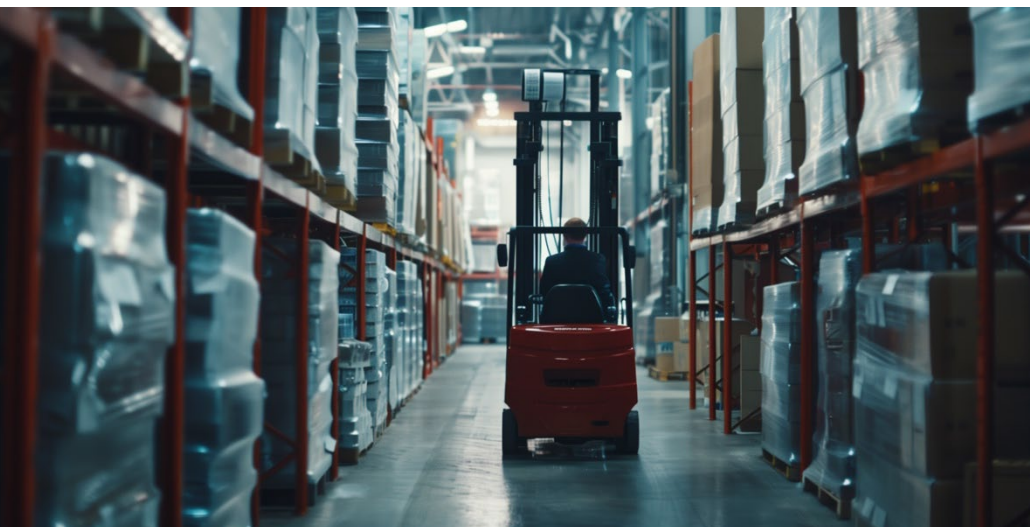
In addition to selling its own proprietary products and services, Ricoh resells several products and services developed by third parties (**Third Party Products and Services**). Ricoh Australia sources Third Party Products and Services both locally and through global, group-wide supply agreements. Procurement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

### 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.



## Ricoh Group's Human Rights Policy

In April 2021, the Ricoh Group established the "Rico Group's Human Rights Policy" in accordance with the "United Nations Guiding Principles on Business and Human Rights." This policy was formulated based on the opinions of experts inside and outside the company and was deliberated by the ESG Committee\*. It is a commitment of the Ricoh Group to respect the human rights of all people, which was approved by the CEO of Ricoh. We had been respecting human rights in accordance with the Ricoh Group Code of Conduct, but we strengthened our efforts based on this human rights policy to comply with international standards, taking into consideration the widening range of human rights issues in the international community. The Policy is positioned at the top of all human rights-related standards and regulations within the Ricoh Group, with its goal as the prevention of human rights violations.

This policy is translated into English and eight other languages and communicated for educational purposes to major group companies in Japan and overseas.

The Policy must be followed by all executives and employees of the Ricoh Group. Suppliers and all forms of business partners of the Ricoh Group are also requested to support and implement this policy.

[Ricoh Group's Human Rights Policy](#)

[\(English\) \(183KB\) Ricoh Group's](#)

[Human Rights Policy \(Japanese\)](#)

[\(506KB\)](#)

### Ricoh Group's Human Rights Policy (Index)

1. Position of the Policy and Scope
2. Conforming to International Principles and Standards
3. Respect for Human Rights of Stakeholders
4. Human Rights Due Diligence
5. Remedy
6. Education and Training
7. Dialogue
8. Transparency

\*ESG Committee is an internal organisation that continuously discusses and makes decisions on mid-and long-term issues of the Ricoh Group in the environmental, social and governance fields at the management level. It is chaired by the CEO delegated by the Board of Directors and consists of executive officers of the Group Management Committee, corporate auditors, and the ESG officer.

[Governance structure of the Ricoh Group](#)



## Structures and Systems

The Ricoh Group's efforts to respect human rights are promoted mainly by the Human Resource Division and ESG Division under the responsibility of the Chief Human Resource Officer and the executive officer in charge of ESG. Issues related to human rights(\*), including mitigation and corrective measures for key human rights concerns identified in the impact assessment, are reported by the ESG Strategy Division to the ESG Committee for discussion.

Human rights risks are positioned as key management risks and are handled within the Ricoh Group's risk management system. In 2021, Ricoh established a human rights risk management system, with a key person within all Ricoh business units, share human rights risks in business promotion with them, and set up a system to manage and respond human rights risks related to business promotion in cooperation with the Group headquarters.

- Concept of sustainability
- Ricoh Group's Risk Management System

(\*) Issues related to the respect for human rights discussed by the ESG Committee

- 2022 March – Report on the results of the assessment of adverse human rights impacts conducted in fiscal year 2021
- 2022 November – Raising human rights issues regarding salary reduction measures in disciplinary actions
- 2023 November – Report on human rights risk conditions at production sites
- 2024 February – Report on future human rights risk mitigation measures based on human rights due diligence

## Ricoh Group Human Rights Respect Promotion Framework

Promoting respect for the human rights of all stakeholders in the Ricoh Group's business value chain (all employees, suppliers, business partners, people in the community, including indigenous peoples and customers) is based on the framework of the United Nations Guiding Principles on Business and Human Rights.

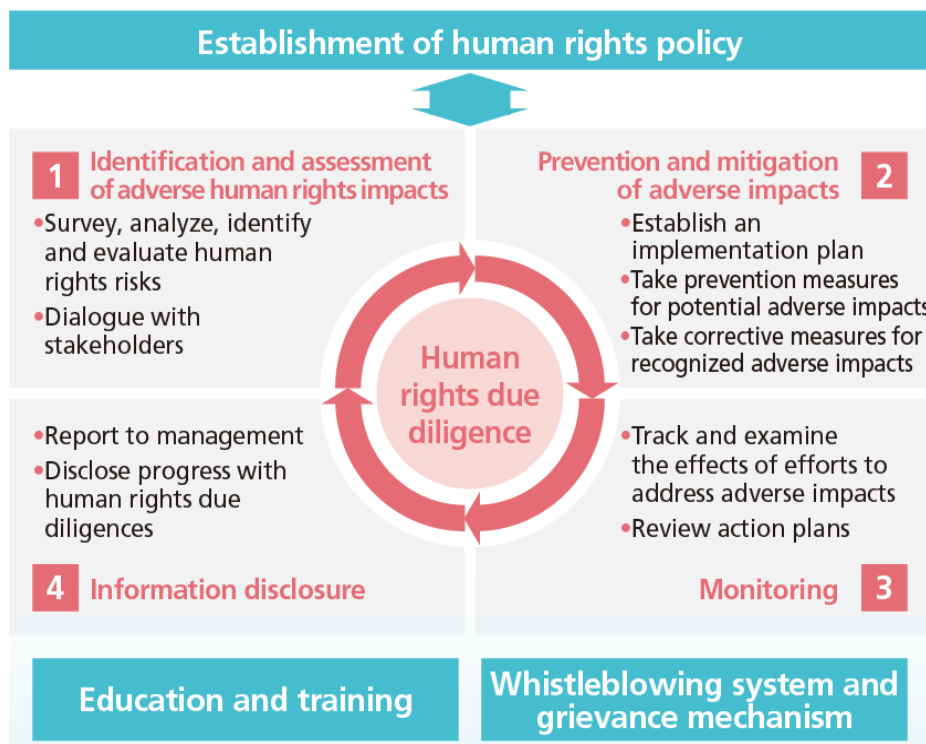


Diagram 1

### Human rights due diligence

Through its human rights due diligence mechanisms, Ricoh strives to protect the human rights of stakeholders and promote sustainable corporate activities.

Under the responsibility of management, we will continue to work on

1. Identification and assessment of adverse human rights impacts;
2. Prevention and mitigation of adverse impacts;
3. Monitoring; and
4. Information disclosure through business activities and supply chains.

## 1

## Identification and assessment of adverse human rights impacts

The Ricoh Group identifies salient human rights issues of all stakeholders involved in the Ricoh Group's business activities through the assessment of their adverse impacts on human rights. In 2013, a workshop was held with the participation of experts to identify human rights risk factors at Ricoh. After that, we identified specific issues of concern that take into account the regional characteristics of the selected risk factors. In 2015, we organised the relevance of identified risks and stakeholders. In 2022, in response to the increasingly complex human rights issues in recent years, we identified major human rights risks in the Ricoh Group and sorted out their impact on stakeholders, referring to major international human rights rules and frameworks, as well as the "Major Human Rights Risks Related to Enterprises' Consideration and Corporate Activities" defined by the Ministry of Justice in Japan. [Table 1]

In addition, we identified salient human rights issues among the typical human rights risks. First, we identified issues for employees working in the Ricoh Group from the perspective of protecting workers and conducted a human rights impact assessment for Ricoh and Ricoh Group manufacturing affiliates, with advice from outside experts. The results of the impact assessment were reported and discussed with management, including the CEO. As a result, seven prominent human rights issues have been identified. [Table 2]

We plan to conduct periodic reviews of salient human rights issues for our stakeholders. In consideration of the importance of risk management, human rights impact assessments are scheduled to be conducted annually throughout the Ricoh Group.

We will gradually review and expand the scope of human rights impact assessments for other stakeholders.



**Table 1: Representative human rights risks and stakeholder relationships**

Negatively affected stakeholders					
Representative human rights risks	Examples of possible negative effects	Employees	Supplier s/ Business partners	Indigenous people / Peoples in the local community	Customers
Wages and benefits	<ul style="list-style-type: none"> <li>• Insufficient wages, unpaid wages, living wages, and minimum wages</li> <li>• Non-provision of contractually agreed social security, welfare and benefits</li> </ul>	✓	✓		
Forced labour	<ul style="list-style-type: none"> <li>• Labour that is forced without the consent of the worker, falsification and failure to fulfil the labour contract</li> <li>• Involvement in human trafficking, Billing of bonded labour and hiring fees</li> <li>• Violation of the freedom to change residence and movement</li> </ul>				
Excessive and unreasonable working hours	<ul style="list-style-type: none"> <li>• Excess of statutory working hours, Consecutive excessive working hours and restrictions on the workers taking time off</li> </ul>				
Occupational Health and Safety	<ul style="list-style-type: none"> <li>• Industrial accidents due to inadequate safety and health environment</li> <li>• Adverse physical and mental effects due to lack of consideration for pregnant women and women raising children</li> </ul>				
Freedom of association	<ul style="list-style-type: none"> <li>• Forceful participation/non-participation in labour unions, collective bargaining and peaceful assemblies, unfair treatment in labour-management negotiations</li> </ul>				
Child labour and young workers	<ul style="list-style-type: none"> <li>• Impairment of children's learning opportunities, and impairment of health and safety</li> <li>• Overtime work, late-night work, and hazardous work by young workers under 18 years of age</li> </ul>	✓	✓	✓	

Negatively affected stakeholders					
Representative human rights risks	Examples of possible negative effects	Employees	Suppliers/ Business partners	Indigenous people / Peoples in the local community	Customers
Discrimination and harassment	<ul style="list-style-type: none"> <li>Discriminatory expression in advertising</li> <li>Gender pay gap</li> <li>Insufficient consideration for diversity and minorities (e.g. sexual harassment, Abuse of authority, Pregnancy discrimination, Discrimination and harassment against male workers who have children and workers responsible for persons in need of nursing care, etc.)</li> <li>Discrimination against foreign employees and job applicants</li> </ul>				
Freedom of expression	Prohibition or suppression of expressing opinions on corporate activities				
Right to access remedies	Failure of the complaint process and retaliatory action against the complainant				
Human rights issues related to technology AI	<ul style="list-style-type: none"> <li>Discriminatory hiring practices through the use of AI</li> <li>Discriminatory use of company products and services</li> <li>Lack of consideration for accessibility</li> </ul>	✓	✓	✓	✓
Right of privacy	<ul style="list-style-type: none"> <li>Acquisition of Personal Information Requiring Care and Provision to Third Parties without Consent</li> <li>Personal information leaked</li> </ul>				
Fair business	<ul style="list-style-type: none"> <li>Failure to pay reasonable compensation to employees for inventions, infringement of intellectual property</li> <li>Coercion or bribery, interference with the provision of proper administrative services by coercion or bribery</li> </ul>				
Human rights issues in the supply chain	<ul style="list-style-type: none"> <li>Direct and indirect involvement in human rights violations* in the supply chain</li> <li>* Serious risks such as forced labour, child labour, and poor working conditions</li> </ul>				

Negatively affected stakeholders					
Representative human rights risks	Representative human rights risks	Representative human rights risks	Representative human rights risks	Representative human rights risks	Representative human rights risks
Impact on local communities and the environment	<ul style="list-style-type: none"> <li>Forcing local residents to leave the area through business activities</li> <li>Infringement of the safety and security of local life due to deterioration of the environment (fire, water pollution, air pollution, spillage of chemical substances, etc.)</li> </ul>				
Consumer safety and the right to know	<ul style="list-style-type: none"> <li>Adverse physical and mental effects of using the company's products and services</li> <li>Inappropriate representation in product labelling, etc., anxiety and adverse effects due to the inability to access necessary information (substances contained, materials, etc.)</li> </ul>				✓

Table 1

## Table 2: Outline of human rights impact assessment

**Evaluation Period:** August to December 2023

### Coverage:

**Ricoh Co., Ltd. (Approx. 300 divisions)**

Ricoh Group production-related sites (21 sites, Coverage: 84%) in Japan and overseas

Ricoh Group non-production companies (58 companies, Coverage: 63%) in Japan and overseas

### Identification of human rights issues

The severity (\*1) and likelihood (\*2) are the two axes for assessing the adverse impact on human rights for each of 15 representative human rights risks. Evaluation identifies issues that are “very serious” or “very serious and likely” as significant human rights issues.

Evaluation tool	Definition of evaluation axis	Evaluation process
(*1) Severity	<p>The seriousness of human rights violations that would occur if risks materialised. Evaluation based on the following;</p> <ol style="list-style-type: none"> <li>1. Scale; Impact on human rights</li> <li>2. Range; Number of people affected or likely to be affected</li> <li>3. Difficulty in Rectification: Possibility of returning affected victims to their original state of enjoying the human rights in question</li> </ol>	<p>Evaluation is conducted based on external information* and the opinions of outside experts after discussions between the human rights department of Ricoh and management.</p> <p>* Guidance issued by governments, NGOs and industry associations on measures to deal with corporate human rights, examples of human rights violations by companies in the past, etc.</p>
(*2) Likelihood of occurrence	<p>Possibility of adverse human rights impacts. Evaluation based on the following;</p> <ol style="list-style-type: none"> <li>1. Obviousness; issues that have already become obvious and are highly likely to occur</li> <li>2. Potential; Issues that have not yet become apparent, but are likely to occur in the future if no measures are taken.</li> </ol>	<p>Evaluation results based on the self-assessment response, the number of allegations for each human rights issue, and the urgency of major focus managerial risks.</p>

Table 2

# 2

## Prevention and mitigation of adverse impacts

The Ricoh Group implements measures to prevent and mitigate identified salient human rights issues which have high adverse impacts on human rights of others.

For particularly salient Human Rights Issues, SAQ confirms the details of the relevant bases where there are concerns about adverse impacts and promotes improvements on individual sites.

Examples of correspondence are as follows.

### Forced labour

In 2020, for example, a third-party audit (RBA Validated Assessment Program (VAP)) was conducted voluntarily by a production site in China. As a result of the audit, it was revealed that some of the labour agencies contracted by the site had required workers to pay a part of the recruiting fees. As a corrective measure to this issue, the site completed the refund of the fees incurred by the workers. Regarding preventive measures, in the same year, Ricoh ordered the prohibition of charging workers recruitment fees.

In fiscal 2023, an RBA VAP audit conducted in April 2023 at a production site in Thailand identified a case of violation in which an employee of an onsite service provider as our indirect supplier was not properly granted annual leave in accordance with local laws and regulations. After the audit, the production site in question revised its annual leave system and informed its suppliers of the regulations, requesting them to comply with them and prevent recurrence. As a result, when the VAP audit was reassessed in October of the same year, the external auditor found that the specific issues had been corrected. We will continue to request suppliers to comply with the Code of Conduct, and if any violations of the Code of Conduct are found, we will request suppliers to correct them.

In addition, to protect workers, we have decided to abolish pay reduction measures in disciplinary actions in FY2022 based on international standards. We are currently confirming the status of response to the target of completing the abolition by the end of FY2023.

### Discrimination and harassment

We provide e-learning education on human rights for new employees and mid-career hires as well as harassment education during our annual management training for managers in the domestic Ricoh Group.

At a production site in Thailand, female workers engaged in standing work had their pregnancy status confirmed prior to employment from the viewpoint of work safety considerations, but this was discontinued in 2023 in accordance with international standards because of the possibility of discrimination.

Additionally, in 2024, with the approval of the ESG Committee, we issued the “Ricoh Group’s Guide to Respecting Human Rights” for domestic and overseas group companies. The guide sets out standards for each of the 15 representative human rights risks to be followed by the Ricoh Group. This guide also covers the compliance standards for the items listed above that will be improved and enhanced in the future. In our efforts to prevent and mitigate adverse impacts, we will prioritize addressing salient human rights issues, but going forward we will also work to mitigate the occurrence of major human rights risks by rolling out and disseminating this Guide globally to all Ricoh Group companies and putting into practice key points. We will regularly evaluate our compliance with the Guide through human rights impact assessments.

### Human rights issues in the supply chain

The Ricoh Group revised the Ricoh Group Supplier Code of Conduct in August 2020 based on the RBA Code of Conduct. Ricoh now requires major suppliers, who account for more than 80% of the total purchase amount, to sign and comply with our supplier code of conduct.

In April 2023, we revised [Ricoh Group Supplier and Partner Code of Conduct](#) as the code of conduct throughout the Ricoh Group supply chain.

By requesting our suppliers and partners to conduct their business activities in compliance with the Code of Conduct, we are working to prevent and mitigate adverse impacts in our extensive supply chain.

#### Supply chain management

As a preventive and mitigating measure against 15 representative human rights risks for the Ricoh Group as defined in the 2022 Human Rights Impact Assessment, we plan to distribute a guide summarising specific measures for each human rights risk to Group companies globally.

We will continue to give priority to addressing salient human rights issues and take measures to prevent and mitigate adverse impacts on human rights.

### Ricoh Group basic policy in procurement activities

The Ricoh Group’s businesses are supported by many suppliers. Recognising these suppliers as our essential business partners, we build a relationship of trust with them, aiming at mutually beneficial development.

Today’s society faces various issues to address, such as those associated with the environment and human rights. To help solve these issues and achieve a sustainable society, the Ricoh Group promotes business activities so as to achieve SDGs, upholding the slogan of “Driving Sustainability for Our Future.” In order to effectively pursue this goal to meet social expectations, we need to cooperate with the entire supply chain, sharing our group policies and visions with individual suppliers.

To this end, we have established the Ricoh Group purchasing regulation to appropriately deal with relevant CSR issues involving legal compliance, fairness and environmental and societal impacts. Using this as a tool, we are working to enhance our efforts on a global scale.

## **Ricoh Group Purchasing Regulation**

### **Fairness of Dealing**

To operate the purchase activities in impartial and fair manner which is open to all over the world, based on the economic rationality.

### **Environmental Conservation**

To operate, as a member of the global citizen, the purchase activities in such a manner as to contribute to the conservancy and the improvement of the global environment.

### **CSR**

To operate the purchase activities bearing in mind CSR and based on the compliance with law and esteem of the social ethics.

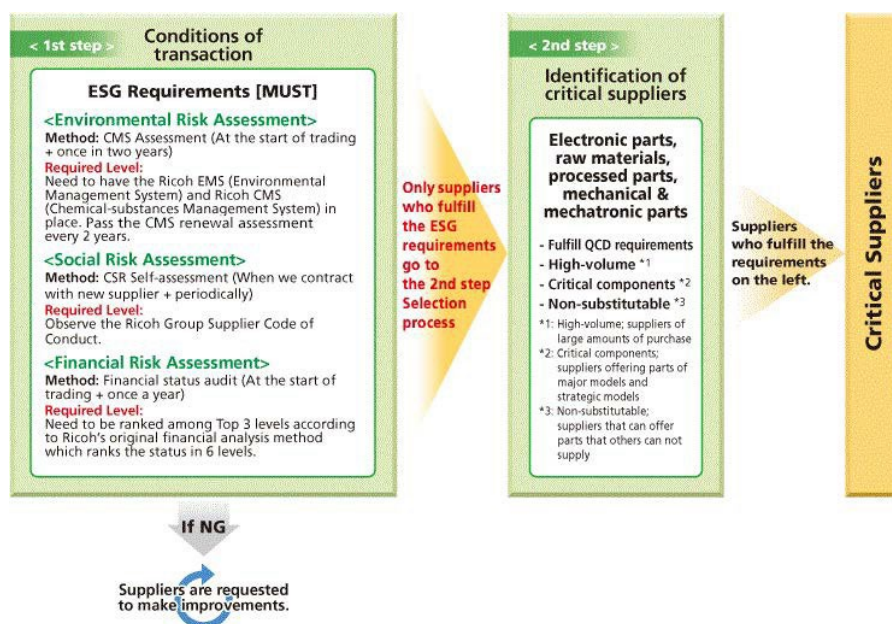
### **Coexistence & Co-prosperity with Suppliers**

To aim at coexistence and co-prosperity with excellent Suppliers on the basis of mutual responsibility.

### **Building relationship with suppliers based on trust**

We identify **critical suppliers** according to certain criteria, taking into consideration the procurement amount and volume, the importance and substitutability of procured materials and parts, as well as the risk of not being able to procure parts because of politics, regulations, labour conditions, energy consumption, potential pollution, etc. in the country concerned.

**As of March 2023, a global total of 292 companies have been specified as critical suppliers.**



## First Step

When starting a new transaction, we select suppliers in accordance with the basic policy in purchasing activities, and include provisions related to ESG (Environment, Social and Governance) in the basic business agreement.

## Second Step

From among the suppliers selected as satisfying the first step requirements, those involving large purchasing amounts, components for key products and strategic models, and non-substitutable parts plus the risk of not being able to procure parts are specified as “critical suppliers.”

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.

## 3

## Monitoring

### Actions to assess and address modern slavery risks

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. Since 2020, we conducted a risk assessment using the RBA SAQ for major production sites of the Ricoh Group.
- Ricoh Group Supplier and Partner Code of Conduct is based on the RBA Code of Conduct and consists of five sections: labour, health & safety, environment, ethics and management systems.
- In 2023, we started annual risk assessments and conducted them at 21 production sites.
- Continuous RBA VAP audits
- In October 2023, we visited two production sites in Thailand to monitor the progress of efforts to improve salient human rights issues. For example, regarding the inadequacy of the vacation leave system for local employees of an on-site service provider, which was identified as one of the "human rights issues in the supply chain," we conducted interviews with employees of the on-site service provider and evaluated the effectiveness of our requests to the on-site provider to make corrections.
- Through this interview, we confirmed that employees were able to take appropriate leave based on our request for improvement.
- We also recognized the importance of increasing awareness of the contact point that can be accessed if an adverse impact occurs. We will continue to carry out continuous improvement activities and monitoring for potential risks.
- 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. All five sites audited from 2022 to 2024 have been certified by the RBA. One site have acquired Gold certification [Table 3]. At the 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 3 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 2024	184.5	Silver	May 2026
Shanghai Ricoh Digital Equipment Co., Ltd.	China	October 2024	175.2	Silver	October 2026
Ricoh Manufacturing (Thailand) Ltd.	Thailand	January 2025	193.7	Gold	January 2027
ETRIA Co., Ltd.-Gotemba Plant	Japan	September 2024	184.4	Silver	September 2026
Ricoh Manufacturing (China) Ltd.	China	November 2024	184.5	Silver	November 2026

Table 3

	FY2019	FY2020	FY2021	FY2022	FY2023 (target)
Country	Japan, China & Thailand	Japan, China, Thailand, other Western countries & Asian region	Japan, China, Thailand, other Western countries & Asian region	Japan, China, Thailand, other Western countries & Asian region	Japan, China, Thailand, other Western countries & Asian region
Scope	Important suppliers	Important suppliers	Important suppliers	Important suppliers	Important suppliers
Number of suppliers	18 • Continually implement a new CSR Self-Assessment based on RBA Code of Conduct • Continually implement site audits (including third-party audits) in Thailand and China	226 • A CSR assessment based on RBA Code of Conduct	161 • A CSR assessment based on RBA Code of Conduct • Implements site audits and improvement activities based on results of CSR assessments	216 • To conduct CSR self-assessments in accordance with RBA (Responsible Business Alliance) on a global scale. • To perform CSR audits on suppliers identified as high-risk based on the results of the CSR self-assessments.	212 (Planned) • To develop supplier improvement plans for the period up to fiscal year 2025 as part of the 21st Medium-Term Management Plan. • To aim to expand low-risk suppliers to 90% by fiscal year 2025.
Response rates from suppliers (target/achievement)	100% (achievement)	86% (achievement)	93% (achievement)	95% (achievement)	100% (target)

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.

Since 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 2023, we expanded the scope to all business areas, identified 292 major suppliers, and conducted assessments. We assess human rights risks in the supply chain, identify, and set improvement targets.
- In 2023, for suppliers with concerns about human rights risks, such as insufficient processes to prevent child labour and forced labour, Ricoh provides some advice for improvement, regularly checks their progress, and continues to support them in their efforts to improve.

The CSR assessment will be reviewed and monitoring of human rights risks at suppliers will be strengthened.

### CSR Self-Assessment Targets and Achievements

Ricoh conducts CSR self-assessments for its suppliers, and then formulates and implements improvement measures together with the supplier's management and employees through follow-up audits to check the status afterwards. Following the launch of a new CSR Self-Assessment program in 2018 based on the RBA Code of Conduct for suppliers in China and Thailand, in August 2020, we revised the Ricoh Group Supplier Code of Conduct. From the analysed responses (rate: 100%), we identified a number of issues. To address them, Ricoh provides related companies with advice for improvement measures and periodically monitors implementation progress or their continued efforts.

## 4

## Information Disclosure

### 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. In accordance with the Ricoh Group's Human Rights Policy, the Ricoh Group discloses in a transparent manner the progress of its efforts to deal with adverse impacts on human rights on the website and in the Integrated Report.

### 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 and Grievance Mechanism

The Ricoh Group provides a whistleblowing system and grievance mechanism that allows stakeholders of the Ricoh Group to report their concerns about human rights without fear of retaliation.

In the event that a petition is made for infringement of human rights, we will promptly investigate the petition and take measures to rectify the adverse impacts on human rights.

For details of each reporting system:

[Supplier hotline](#)

["Ricoh Group Hotline" and "Ricoh Group Global Whistle-Blowing System"](#)

## 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.

## Education and Training

### Education and Training on Human Rights

Our respect for human rights prioritises due consideration for all stakeholders associated with corporate activities and requires that each and every employee who is involved in daily operations has a proper understanding of human rights and a deep awareness of human rights issues.

In fiscal 2012, we provided human rights education (e-learning on corporate activities and human rights) for executives and employees of affiliated companies in Japan to learn about human rights from the viewpoint of avoiding human rights risks and improving corporate value.

In 2021, we held a study session for Ricoh executives with the aim of understanding business and human rights, and we invited outside experts to attend.

Along with the revision of the Ricoh Group's Human Rights Policy, we provided human rights education to more than 75,000 executives and employees in Japan and overseas through e-learning and webinars from 2021 to 2022, for the purpose of understanding the Ricoh Group's Human Rights Policy and the relationship between Business and Human Rights.

### Results of Human Rights Education in FY2023

1. Target company: 80 overseas Ricoh group companies
2. The number of participants: Approximately 45,000 employees and executives. (The implementation rate: 94%)

We will continue to provide education and training so that each and every employee can understand the necessity of respect for human rights in business.

## Third-party verification of environmental and social data

The Ricoh Group's major environmental performance data, including greenhouse gas emissions (Scope 1, 2 and 3), major social data are subject to independent verification by SGS Japan Inc. a third-party audit provider, as a way of enhancing the credibility of the data and our compliance system. Audit results are posted on our website for easy access by our stakeholders.

Verification was conducted on information systems, methods of data collection, compilation and analysis, as well as data accuracy.

We will work continuously to enhance our data credibility through the use of third-party verification services and expansion of the scope of verification, thereby raising the quality of our ESG activities.

### **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.

### **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 "Rico 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.

### **[Rico Group's Responsible Minerals Procurement Policy](#)**

### Conflict Minerals Survey – Fiscal 2023 and future efforts

In fiscal 2023, based on the results of a survey conducted for worldwide first-tier suppliers of the Ricoh Group, we identified as accurately as possible each of the parts and raw materials used in the products manufactured or consigned during the year, and conducted a common survey on the use of conflict minerals and received CMRT responses from 98% of suppliers. In the survey of 2023, the Ricoh Group identified 222 smelter companies that have acquired the certification of RMAP Conformant and are conflict-free. The rate of RMAP Conformant smelters to the total number of smelters and refineries identified in the Ricoh Group supply chain was 65% in fiscal 2023. In recent years, as the number of companies surveyed has increased, the number of newly specified smelters and refineries that have not obtained RMAP Conformant has been increasing, while the number of RMAP Conformant smelters has been excluded from RMI certified smelter list. As a result, the ratio of RMAP Conformant smelters has been temporarily decreasing. Therefore, we will continue to call on Tier 1 suppliers to switch to RMAP Conformant smelters. We also expect tier 2 and subsequent suppliers to encourage upstream companies and smelters to switch to RMAP Conformant smelters.

Starting with the fiscal 2021 survey, we requested suppliers to report the scope of their CMRT/EMRT responses not on a company basis (A: Company) but on a part-by-product basis (B: Product) delivered to Ricoh Group. As a result, about 90% of suppliers responded to the questionnaire on a part-by-product basis.

As a result, analysing the response information from the first-tier suppliers, it was confirmed that there was a possibility that a certain number of products contain parts or materials which originated in the Democratic Republic of the Congo or an adjoining country. Accordingly, the Ricoh Group conducted due diligence on the relevant first-tier suppliers. We will discuss our future business with the suppliers who have not responded to this survey and are judged to require improvement based on the results of the ESG Self-Assessment.

In addition, in fiscal 2020, we began a survey of the cobalt supply chain by identifying major suppliers that had supplied the Ricoh Group with products and parts containing cobalt in the past. The response rate from surveyed suppliers in 2023 was 97% of the 79 cobalt smelters and refineries and 45 were RMAP Conformant refineries identified. Ricoh cooperates with industry organisations, such as JEITA and RMI, and we continue to conduct due diligence and close monitoring of our supply chain.

	FY2021	FY2022	FY2023				
			Total	Gold	Tantal	Tin	Tungsten
Number of smelters & refiners	332	345	344	173	36	84	51
Number of RMAP conformant smelters & refiners (Conflict-Free)	229	229	222	90	34	65	33
Number of RMAP Active <sup>*5</sup> smelters & refiners	18	9	4	2	0	2	0
Number of other RMI smelters & refiners <sup>*6</sup>	85	107	118	81	2	17	18
Response rate from suppliers	95%	96%	98%	—	—	—	—

	Cobalt		
	FY2021	FY2022	FY2023
Number of smelters & refiners	63	72	79
Number of RMAP conformant smelters & refiners (Conflict-Free)	30	39	45
Number of RMAP Active smelters & refiners	10	5	5
Number of other RMI smelters & refiners	23	28	29
Response rate from suppliers	95%	92%	97%

<sup>\*5</sup> RMAP Active: Smelters & refineries under RMAP audit or are going to be audited.

<sup>\*6</sup> other RMI smelters & refiners: RMI certified smelters & refiners other than RMAP Conformant / Active.

<sup>\*7</sup> Cobalt Survey In fiscal 2020, we conduct a trial survey of a limited number of suppliers.

Table 5

## 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.

From 2020 onwards, CSR assessments have been 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.

In the fiscal year 2023, a total of 283 suppliers, were assessed through desktop evaluations and on-site confirmations. Among the critical suppliers, 96.9% were evaluated. There were 5 critical suppliers identified as high-risk. For a total of 5 suppliers, corrective action plans were developed and implemented based on mutual agreement.

In the fiscal year 2023, a total of 27 suppliers participated in the capacity development support program.

Moving forward, Ricoh will continue to prioritise the enhancement of organisational capabilities among suppliers and remain committed to the effective implementation of the supplier evaluation program and continuous improvement activities.

As a result of its efforts, Ricoh continues to be recognised for its corporate social responsibility around the world:

- In 2023, 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 continuously since 2014. 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. 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.
- Ricoh was selected as a member of the Sustainability Yearbook 2023 by S&P Global.
- In January 2023 Ricoh has been rated as one of Global 100 Most Sustainable Corporations in the world. This marks 11th selection in total as Ricoh, which was selected 10 consecutive years from 2005 to 2014.
- September 2023 Ricoh was recognised as one of the World's Best Companies of 2023 by TIME Magazine.

Ricoh continues to support the United Nations Global Compact – a voluntary worldwide initiative that encourages companies and organisations to act as good members of society by being responsible and creative leaders and help materialise achieve sustainable growth. Companies are encouraged to implement and comply with this initiative's Ten Principles, covering such areas as human rights, labour, the environment, and anti-corruption. Ricoh was the second Japanese company to sign in 2002.



## 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
- ILO Declaration on Fundamental Principles and Rights at Work
- ISO 26000 (Social Responsibility Standard)
- OECD Guidelines for Multinational Enterprises
- ILO International Labour Standards

## 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 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 2024.

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 by the Board of Directors of Ricoh Australia Pty Ltd and signed by:

A stylized, handwritten signature in black ink, appearing to read 'Yasushi' followed by a flourish.

Yasushi Takahashi  
Managing Director  
Rico Australia Pty Ltd

