

Education and Awareness

We are clarifying the matters that should be observed by all our employees and encouraging them to make spontaneous efforts for compliance.

Consolidating management also means evaluating our corporate activities. If a company that is part of a group is involved in any form of misconduct, the group as a whole will be tarnished, and this will cause significant damage to the group's image and brands. To eliminate misconduct, all members of the Ricoh Group are committed to following the common values set out in the Ricoh Group CSR Charter/ Code of Conduct to prevent the occurrence of all forms of misconduct, and we are doing our utmost to make these common values compulsory.

Formalizing Our Values

● The Ricoh Group CSR Charter/ Code of Conduct

The Ricoh Group CSR Charter and Code of Conduct should be observed by all members of the Ricoh Group. They were revised at the Working Group for Discussions on Ricoh Business Code of Conduct, which was organized under the CSR Committee. Examples were taken, and the content was reviewed in the light of the Ricoh's already-existing Code of Conduct. In doing so, our policy was to establish rules that would apply globally to group companies (see the chart on the right).

CSR Education/Compliance Education

● Contents of CSR Education

Ricoh Group CSR Charter and Code of Conduct, which came into force on January 1, 2004, have been compiled into a database on the Group's intranet, which is always available to employees. In addition, the Code of Conduct has been distributed in booklet form to all employees, who are obliged to carry them. In the meantime, explanations of the Code of Conduct, in-

Preliminary Consideration

- Discussion of the positioning of the Ricoh Group's newly established CSR Charter and Code of Conduct in the management philosophy and the Group's standards
- Confirmation of conditions for establishing/revising and implementing the Codes of Conducts in the Ricoh Group's domestic and overseas companies

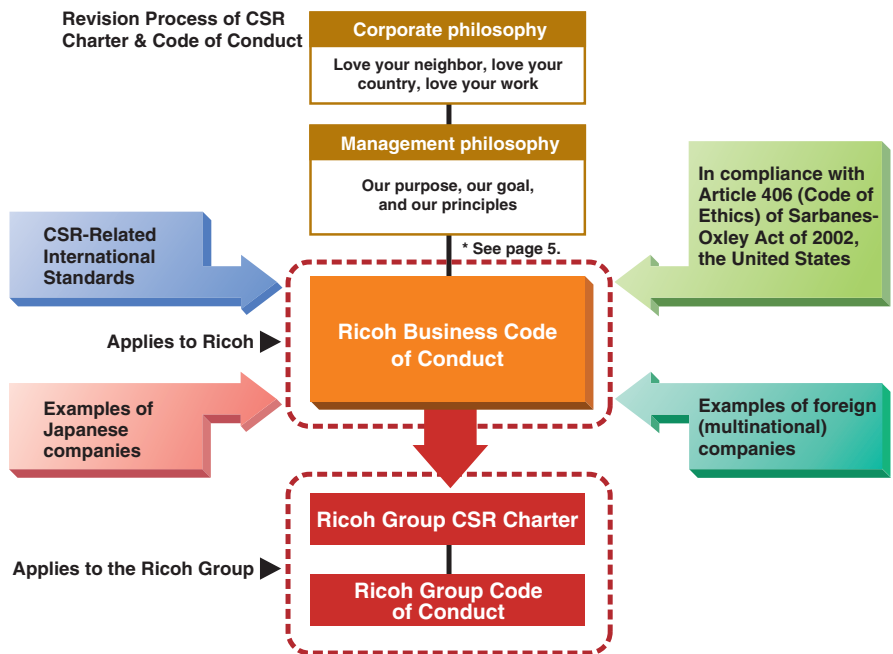
Issues Identified

- Consider the nature of the different business categories of the Ricoh Group's companies and take their circumstances into account
- Consider the circumstances in different countries and regions from a global point of view and take them into account

Action Steps

- The Ricoh Group CSR Charter was established to clarify the principles of corporate behavior that apply to Ricoh Group companies globally.
- In response to the Ricoh Group CSR Charter, a Code of Conduct was established to be observed by each and every member of the Group.
- The Ricoh Group Code of Conduct is given higher priority than the Ricoh Group Standards (RGS), the common standard implemented across the Ricoh Group, and the internal standards of its affiliates.
- The global point of view is given much importance, and thus the content of the United Nations' Global Compact, the OECD* Guidelines for Multinational Enterprise, the Sarbanes-Oxley Act, etc. were reflected in the Ricoh Group CSR Charter and Code of Conduct.

* OECD: Organisation for Economic Co-operation and Development



The Ricoh Group Code of Conduct Booklet

cluding actual examples, have also been stored in a database, which is available for perusal and distribution. In addition, educational materials (video tapes and CD ROMs) on the CSR Charter and Code of Conduct have been prepared. Thus, we plan to support education for all employees so that each will become more aware of CSR.

● **Compliance Measures and Education**

Education that encourages employees to observe laws and regulations and instill a sense of corporate ethics is divided into introductory education and further education involving case studies and individual risk management. This is given to new employees and new management-level officers. At the same time, efforts to develop education in accordance with the compliance platform, principles, and measures of respective organizations such as the sales divisions are also being promoted, because it is important to link the development of education closely with the actual workplace.

● **Educational System**

Education on the CSR Charter and Code of Conduct to all employees in the Group is managed and implemented by the CSR Division. In the meantime, the Legal Division supervises and takes charge of compliance education. With regard to concrete and individual risk management in busi-

ness operations, the functional divisions supervising the relevant operation provides education on related laws/regulations, standards, and manuals. In the meantime, e-learning is used as the main educational tool for general education and management, as well as for management of the attendance records of respective employees.

● **Example of Development in the Sales Divisions**

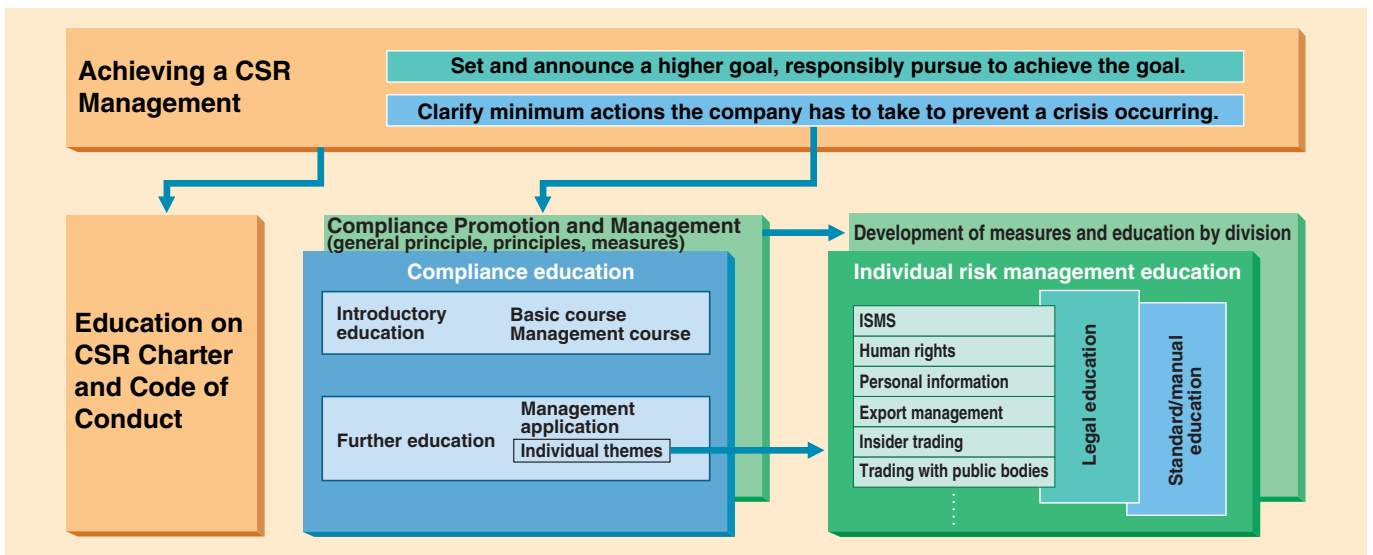
The sales divisions in Japan have set a compliance general principle and designated eight basic codes of conduct that form the core of the general principle (1. observation of rules, 2. antimonopoly law, 3. copyright, 4. ethics, 5. human rights, 6. integrity, 7. separating company business from personal affairs, and 8. freedom from corruption). Under the educational systems e-learning is used to educate employees in each of these codes of conduct by level and type of business.

Compliance Support System

● **Advice Hotlines**

Since April 2003, the Ricoh Group has set up two advice Hotlines, one in the CSR Division and the other at our Law Firm. The hotlines allow employees to seek advice or to discuss situations in which they find it difficult to make judgments in their daily operations. The names and sections of employees using the hotlines are verified to prevent the service being misused. When the Law Firm informs the CSR Division of a specific problem, however, anonymity is maintained to protect the employee. In addition, a protection system for employees has been established, which has been designated as a standard across the Ricoh Group, so that the hotline can operate in an appropriate manner. This system is currently limited to Japan, and the number of consultations is 4 to 5 per month. Results of discussions are fed back to employees where necessary.

Overview of CSR, Compliance Measures and Education System



Sales Division Compliance Education System (code-based schematic chart) (■ participation in courses)

	Observation of rules	Antimonopoly Law	Copyright	Ethics	Human rights	Integrity	Separating company business from personal affairs	Freedom from corruption
Managers/officers	■	■	■	■	■	■	■	■
Public sector sales	■	■	■	■	■	■	■	■
Private sector sales	■	■	■	■	■	■	■	■
General employees	■	■	■	■	■	■	■	■