

The Ricoh Group is developing businesses all over the world under the slogan "a company should contribute to the society as a part of society." Ricoh's Code of Conduct, given below, reveals the Company's commitment

to social responsibilities. Ricoh Group companies establish and put into practice their own codes of conduct pursuant to this one.

## Ricoh's Code of Conduct

### 1. Ricoh's Basic Attitude (See pages 58-66.)

#### (1) Conduct sound business activities.

- 1) Aim toward stable growth and development.
- 2) Comply with social ethics and normal business practices.

#### (2) Promote mutual understanding with society.

- 1) Respect different cultures and practices.
- 2) Sincerely promote public relations.

#### (3) Support activities that contribute to society.

- 1) Engage in activities that contribute to local communities.
- 2) Create a corporate culture in which activities that contribute to society are encouraged.

#### (4) Respect the global environment.

- 1) Address environmental issues in a positive manner.
- 2) Manufacture products that are environment friendly.
- 3) Keep the prevention of pollution and the conservation of energy in mind.
- 4) Product recycling
- 5) Strive to maintain and improve the environment.

### 2. Employee Responsibility (See pages 67-72.)

#### (1) Ricoh's expectations of employees

- 1) Employees will comply with laws and regulations.
- 2) Employees will be civil.
- 3) Employees will act like responsible representatives of Ricoh.
- 4) Employees will improve customer satisfaction.
- 5) Employees will show initiative and creativity.
- 6) Employees will consider the other person's point of view.
- 7) Employees will align individual satisfaction with company growth.

#### (2) Respect basic human rights.

- 1) Abolish discrimination.
- 2) Protect individual privacy.

#### (3) Provide a work environment in which individual capabilities can be demonstrated.

- 1) Provide opportunities for self-fulfillment.
- 2) Respect the particular skills of others.
- 3) Give objective and fair performance evaluation.
- 4) Create a comfortable work environment.

### 3. Guidelines for Fair Corporate Activities

#### (1) Compliance with the Antimonopoly Law

- 1) Such meeting or agreement should not be held or made that restricts each other's free business activities.
- 2) Trading advantage should not be used.
- 3) Misleading indication should not be made and excessive premiums or prizes should not be offered.

#### (2) Compliance with Export-Related Laws

- 1) Prior verification
- 2) Careful judgment
- 3) Verification based on document

#### (3) Entertainment and gifts

- 1) Compliance with generally accepted business practices.
- 2) Entertainment or gift should not be offered to officials of public organizations (including former officials).

#### (4) Transactions with public organizations and political contributions

- 1) Transactions in strict compliance with related laws.
- 2) Illegal political contributions should not be offered.

### 4. Guidelines for Protecting Corporate Information

#### (1) Trade secrets\*

- 1) Conformance to control regulations
- 2) Authorized disclosure
- 3) Corporate information should not be used for a private purpose.
- 4) Corporate information should not be obtained by illegal means.

\* The term "trade secrets" refers to corporate information with asset value that has been created or obtained through normal business activities.

#### (2) Insider information\*

- 1) Insider information should not be disclosed to any third party.
- 2) Insider information should not be used for private purposes.

\* The term "insider information" refers to important internal information concerning unannounced increases or decreases of capital, new products, business tie-up, etc.

#### (3) Intellectual property\*

- 1) Prompt report to the company.
- 2) Respecting intellectual property of third parties.
- 3) Conforming to disclosing procedures.

\* The term "intellectual property" refers to patents, utility model rights, designs, trademarks, copyrights, rights of layout-designs of integrated circuits, trade secrets, etc.

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Only the summaries of articles have been listed.