

To Business Partners

**Request of Understanding and Cooperation for
Bribery Prevention Policy of Ricoh Group**

In the Ricoh Group CSR Charter we set that in order for the Ricoh Group to fully discharge its corporate social responsibilities (CSR) from a consistent global perspective, we must conduct our business with the proper social awareness, understanding and being compliant with both the letter and the spirit of national laws and the rules of international conduct.

In light of the above policy and the global drive to tighten regulations against bribery, recently the Ricoh Group has newly established the Ricoh Group Standard for Bribery Prevention based on the Ricoh Group Code of Conduct. Guidance is being provided to officers and employees of Ricoh Group companies via thorough instructions on best practice to prevent bribery.

We believe that, in order to ensure the business activities of Ricoh Group are conducted according to the above policy, the understanding and cooperation of our business partners on the bribery prevention policy of the Ricoh Group will be essential.

Please read the attached guidelines, and support the bribery prevention policy of the Ricoh Group.

April, 2017



Yoshinori Yamashita
CEO, Ricoh Group

RICOH GROUP BRIBERY PREVENTION GUIDELINES

Purpose and Scope

The Ricoh Group will ensure compliance with laws and regulations prohibiting corruption and bribery that are applied in any of the countries and regions in which the Ricoh Group operates business (including where laws of any country are applied extraterritorially).

The purpose of these Guidelines is to ask business partners of the Ricoh Group to support the policy of the Ricoh Group, and to ensure that our business partners do not engage in bribery for the benefit of the Ricoh Group.

These Guidelines are aimed at our business partners who perform services for the benefit of or on behalf of the Ricoh Group.

For example, in cases where agencies, distributors/dealers, brokers, consultants, joint venture partners, contractors, suppliers, etc. of any Ricoh Group Company act on behalf of the Ricoh Group Company, those business partners will be in the scope of these Guidelines.

Definition of Terms

The definitions of the terms used in these Guidelines are as follows:

"Ricoch Group" refers to Ricoh Company, Limited and related companies included in consolidated financial statements of Ricoh Company, Limited, and "Ricoch Group Company" refers to an individual company in the Ricoh Group.

"Public Officials or Foreign Public Officials" refers to persons that assume any legislative, administrative, judicial or other public function (including candidates therefor), officials of any governmental body, personnel of any company or other organization owned or operated by any government, political parties and party leaders, of any country or region, and personnel of any public international organization that consists of countries and/or regions or of the governments of countries and/or regions.

"Facilitation Payment" refers to the giving of any money, gift, etc. for the purpose of facilitating any everyday operation of a Public Official or Foreign Public Official, such as:

- Processing procedures by administrative authorities, including permissions and approvals and visa issuances and
- Supply of any public service, such as that of the police, or any service by an enterprise operated under governmental authority.

Requests

1. Regarding Acts of Bribery

Ricoh Group Business Partners must not engage in the following acts with the aim of obtaining or retaining business or any advantage in the conduct of business for the Ricoh Group;

- (i) offer, promise to give or give any money, gift, entertainment or any other benefit (including a Facilitation Payment) to Public Officials or Foreign Public Officials, or
- (ii) offer, promise to give or give any money, gift, entertainment or any other benefit to any person other than Public Officials or Foreign Public Officials, except in cases where giving such benefit is lawful under laws and regulations prohibiting corruption and bribery that are applied in the country or region concerned and within the bounds of general good business practice.

Please fully understand that those acts may

- cause fines, imprisonment, etc. against the business partner who did any of those acts, as violations of laws and regulations prohibiting corruption and bribery,
- seriously damage trust in both of the business partner concerned and the Ricoh Group, and interfere with the execution of the business operations of both the business partner concerned and the Ricoh Group, and
- cause criminal punishments against the Ricoh Group, in addition to the business partner concerned.

2. Entertainment, Gift, etc. to the Ricoh Group

Officers and employees of the Ricoh Group will refuse to accept gifts and hospitality out of the bounds of general good business practice, or without approval granted by a person with decision making authority designated by the Ricoh Group Company concerned. We ask for the understanding and cooperation of our business partners on this point.

3. Investigation and Audit

Ricoh Group Companies may conduct investigations for the prevention of bribery and audits regarding the status of compliance with these Guidelines and applicable laws and regulations prohibiting corruption and bribery. We ask for the understanding and cooperation of our business partners on this point.

4. Thorough Recordkeeping

Business Partners must record accurately in accounting ledgers or financial records any and all payments and receipts of payments in relation to the business related to the Ricoh Group.

5. In the Event of Violation, etc.

In the event that any violation or suspected violation of these Guidelines or any applicable law and regulation prohibiting corruption and bribery is recognized, please report promptly to the relevant Ricoh Group Company.

In addition, business partners are required to fully cooperate in investigations which may be conducted by the Ricoh Group or any relevant authority with respect to such violation or suspected violation.

6. Making These Guidelines Known

These Guidelines should be made known if appropriate to officers and employees, etc. and third parties such as subcontractors of the business partner concerned, who become engaged in the business with the Ricoh Group Company concerned.

7. Revision

Please note that these Guidelines will be reviewed and revised when and as appropriate should the need arise in order to comply with any law and regulation prohibiting corruption and bribery that applies to the Ricoh Group.

The latest version of these Guidelines can be found at the website of the Ricoh Group.
[<https://www.ricoh.com/sustainability/governance/compliance.html>].

The End.