
Code of Conduct Policy

1. Scope

All Employees

2. Purpose

The Ricoh Group Code of Conduct establishes the basic standards that we expect all employees to observe in their daily activities.

The Code of Conduct is grouped under the same four principles defined in the Ricoh Corporate Social Responsibility Charter, which defines how we, as a business, manage our global activities in a sustainable and responsible manner, in accordance with the universal principles defined in the UN Global Compact.

3. Policy

The basic attitudes to be adopted by Employees

We expect all Ricoh employees to:

- Observe the relevant national and regional laws at all times
- Maintain high ethical and moral standards
- Observe the rules and regulations established by Ricoh
- Make every effort to ensure the maximum possible customer satisfaction
- Seek to maintain creativity and think independently so we continue to add value
- Understand the other person's views by "putting ourselves in their place"
- Seek to ensure the progress of the company is fully consistent with the personal happiness of its people

The basic attitude of the Ricoh Group to its employees

Ricoh is committed to ensuring all employees:

- Have the opportunity to learn, develop and grow, not only in a work context but also as individuals
- Provide support to improve existing skills and develop new ones
- Have a fair and impartial system for evaluating and recognizing their individual skills and abilities
- Have a safe, pleasant and functional working environment

Integrity in Corporate Activities

- We develop and provide customer-centric products and services.
- We ensure strict compliance with the laws and regulations governing fair competition, fair trading, and the banning of monopolies.
- We do not take advantage of insider information to make profits or undermine fair and healthy trading of stocks and shares.
- We ensure all business information is appropriately managed and protected.

- We do not offer or accept entertainment or gifts intended as bribes.
- We do not make financial contributions or give support to political parties or campaigns.
- We ensure compliance with all relevant trading and export related legislation and resolutions.
- We encourage activities to create, protect and utilize our intellectual property.
- We do not participate in any anti-social or criminal activities.
- We do not approve of individual actions by employees that could damage the Ricoh brand, image or ability to conduct business.
- We respect and enforce the rules for controlling corporate assets.

Harmony with the Environment

- Recognising our responsibilities as a global citizen, we ensure our corporate activities are aligned with environmental preservation activities.

Respect for People

- We respect human rights on the basis of mutual understanding and do not discriminate on the basis of race, religious faith, gender, age, citizenship, disabilities, etc

Harmony with Society

- We develop partnerships that enable us to make an active contribution to society.
- We conduct our business in a manner that builds trust-based relationships within the communities and regions we operate in.

For more information

- We develop partnerships that enable us to make an active contribution to society.
- This document is a summary of the Ricoh Group Code of Conduct, prepared for Ricoh Europe employees by the CSR Division.
- A full version of the Ricoh Group Code of Conduct is published on the Intranet.
- Further information on the universal principles defined in the UN Global Compact can be found at www.unglobalcompact.org.
- The Ricoh Corporate Social Responsibility Charter is published on the Internet and is available to all. Ricoh Europe's activities in support of this charter are detailed in our Sustainability Report, also available to the public via the website.

If you cannot find these documents or have any further enquiries, please email us at csr@ricoh-europe.com.



Rebekah Wallis
Director - People & CR

Diversity Policy

1. Scope

All employees, temporary employees, contractors, clients and visitors.

2. Purpose

Ricoh UK are committed to providing equal of opportunities and to a proactive and inclusive approach to equality in employment. No applicant or employee will be treated less favourably than another on the grounds of a protected characteristic which are defined as sex, sexual orientation, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race and religion or belief.

The Company recognises its legal and social responsibilities ensuring it follows correct procedures that are consistent with the relevant legislation and Codes of Practice. This policy is intended to assist the Company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

Eliminating discrimination depends as much on the behaviour of each employee as on management. To ensure that employees are aware of the Codes of Practice and legislation about equal opportunity, information is provided below.

3. Policy

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

A Diversity Policy is an integral part of fair and effective management. It ensures that employees and the Company act within the law, and helps managers to make decisions about people based on job-related factors only.

The Law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as 'protected characteristics'.

Implementation

The Company will take active steps to promote good practice. In particular, it will:

- Promote equality of opportunity
- Ensure its policies are continuously reviewed in order assess the representation of different groups and whether more needs to be done to achieve equality of opportunity for colleagues and job applicants.

- Promote an inclusive culture and good management practice, through the development of codes of best practice, policies, and training.
- Take positive action wherever possible to support this policy and its aims.

Equal Opportunities in Employment

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Recruitment, Selection and Promotion

All applicants who apply for jobs with us are treated fairly and are considered solely on their ability to do the job.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the competency requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The Company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under representation of any group that the Company identifies as being under represented in particular types of job.

Types of unlawful discrimination

Direct Discrimination is where a person is treated less favourably than another because of a protected characteristic.

Indirect Discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (does not cover marriage and civil partnership, and pregnancy and maternity).

Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership and maternity), by third parties such as clients or customers.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complaint to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010.

Monitoring

The Company will monitor the ethnic, gender, sexual orientation and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems and review its equal opportunities policy in accordance with the results shown by monitoring. If changes are required, the Company will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

Training

The Company will provide training to in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The Company will provide training to all existing and new employees and others engaged to work at the Company to help them understand their rights and responsibilities and what they can do to help create a working environment free of bullying and harassment. The Company will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment

Dignity at Work

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The Company has a separate dignity at work policy, which deals with these issues.

Customer, Suppliers and other people not employed by the Company

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

How to make a complaint

If you feel that you have been treated unfairly and not been given an equal opportunity, the matter may be capable of being dealt with by first raising it with the person or manager concerned with the issue. This can be done by yourself or by someone on your behalf. However this may not always work or you may not wish to discuss your concerns with the individual, in which case you should use the procedure set out in this policy.

Complaints Procedure

If you consider you have been unlawfully discriminated against you may use the Company's grievance procedure to make a complaint. If the complaint involves bullying or harassment the procedure set out in the Dignity at Work policy will be followed.

The Company will take any complaints seriously and will seek to resolve any grievance which it upholds. You will not be penalised for raising a grievance even if your grievance is not upheld, unless your complaint is untrue and made in bad faith.

Responsibility of all employees

Every employee is required to assist the company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Review

This policy will be monitored by the Company to ensure its effectiveness and will be updated in accordance with changes in the law. If changes are required, the Company will implement them and inform all employees.



Rebekah Wallis
Director - People & CR

Email and Internet Policy

1. Scope

All employees, temporary employees, contractors, clients and visitors.

2. Purpose

This Policy contains important rules covering e-mail and access to the internet. Many of the rules apply equally to the Company's other methods of communicating with the outside world such as letter, fax and telephone.

This policy explains how e-mail and internet access should be used. It explains what you are allowed to do and what you are not allowed to do.

The Policy starts with some general rules, do's and don'ts. We have then identified 6 areas where legal problems might arise for you and for the Company. These are harassment, defamation, copyright, entering contracts, pornography and confidential information. Under each section there is an explanation of the potential legal problems and some rules to help avoid those problems.

Failure to comply with the rules set out in this Policy:

- (a) may result in legal claims against you and the Company
- (b) may lead to disciplinary action being taken against you including dismissal.

It is vital that you read this Policy carefully.

If there is anything that you do not understand, it is your responsibility to ask your manager to explain. A copy of this Policy is also posted on Lotus Notes – under Policies and Procedures on the Ricoh Intranet.

3. Policy

General Rules, Do's and Don'ts

- The Company e-mail system is primarily for business use. Occasional and reasonable personal use is permitted provided that this does not interfere with the performance of your duties.
- All e-mail is stored and e-mail (including personal e-mail) may be inspected by the Company at any time without notice.
- All e-mails should be correctly classified using one of the four classifications on the classification tool (In strictest Confidence, In Confidence, Internal or Public. Refer to the ISMS handbook in the document library on the intranet for further guidance.
- If you send a personal e-mail, start or sign off the e-mail message with the following statement:

"Personal e-mail. This e-mail is personal. It is not authorised by or sent on behalf of the sender's employer. This e-mail is the personal responsibility of the sender."
- Ask yourself, before sending an e-mail, how you would feel if your message was read out in Court. E-mail messages may have to be disclosed in litigation.
- Keep all passwords secure. Do not write them down or share them with anyone.

- Check your e-mail on each working day or arrange for a duly authorised person to do so on your behalf.
- Reply promptly to all e-mail messages requiring a reply. Where a prompt detailed response is not possible, a short e-mail acknowledging receipt and giving an estimate of when a detailed response will be sent should be sent.
- Do not impersonate any other person when using e-mail or amend messages received.
- Do not import any non-text file including files received as e-mail attachments, onto your system without first checking them for viruses using the approved software. If you send an e-mail with an attachment you must include the following statement in your message:

"We cannot accept any liability for any loss or damage sustained as a result of software viruses. It is your responsibility to carry out such virus checking as is necessary before opening any attachment."

- Do not create e-mail congestion by sending trivial messages or personal messages or by copying e-mails to those who do not need to see them. Make use of the bulletin boards.
- Do not access the World Wide Web for purposes other than those for which you are employed.
- Do not deliberately visit, view, or download any material from any Web site containing sexual or illegal material or material which is offensive in any way whatsoever.
- Do not subscribe to any bulletin boards, newsgroups or any other Internet service of any kind whatsoever without prior written permission from your manager. Do not download software onto the Company's system without the prior written permission from the MIS Support Manager of the Infrastructure team. This includes software and shareware available for free on the Internet.

Harassment

What is harassment?

It is the Company's policy that all employees must be allowed to work in an environment free from harassment of any kind. This includes (but is not limited to) sexual and racial harassment and harassment on the grounds of sexual orientation, religion and disability. Harassment affects morale and prevents a person fulfilling their full potential in their work.

- Sexual harassment is unwanted conduct of a sexual nature, or other conduct based on sex affecting the dignity of women and men at work. In the context of this Policy this includes sending messages with sexually suggestive material, repeated offensive sexual propositions or abuse of a sexual nature.
- Racial harassment is unwanted conduct based on race affecting the dignity of women and men at work. In the context of this Policy this includes sending messages containing offensive insults or "jokes" based on race and abuse of a racial nature.

What you must not do

- Do not send abusive messages or messages which contain sexual or racist material.

What are the consequences of not following this Policy?

- Harassment is a criminal offence for which the harasser can be imprisoned. Victims of harassment may be able to claim damages from the harasser and from the Company. In addition to legal costs, harassment impacts productivity and the Company's ability to recruit and retain staff.
- If you are suspected of having committed acts of harassment, you will be dealt with under the Company's disciplinary procedures which may lead to your dismissal.

Reporting

Any employee who is subjected to or has knowledge of harassment (whether emanating from inside or outside of the Company) is encouraged to immediately report that harassment to the HR Department.

Defamation

What is defamation?

Defamation is the publication of a statement which adversely affects a person's, or a Company's, reputation. Publication may be by way of internet or e-mail.

What you must not do

Do not send or circulate, internally or externally, any information which is defamatory. In particular, you must not send or circulate (internally or externally) any information which contains negative comments about an individual or Company without first checking that the contents of the information are accurate. If in doubt, you must check with your manager.

What are the consequences of not following this policy?

A person or Company defamed may sue you and the Company for damages. There is a defence that the information was "true" but the onus would be on you or the Company to show that.

Failure to follow these rules may lead to disciplinary action being taken against you including your dismissal.

Copyright

What is copyright?

The owner of copyright has the exclusive right in certain works such as documents, articles, books, plays and musical compositions, so that they cannot be copied or used in certain other ways without the consent of the copyright owner.

What you must not do

Do not download, copy or transmit to third parties the works of others without their permission as this may infringe copyright. Copyright is most likely to be breached:

- when you download material from the internet
- when you copy text or attach it to an e-mail message.

What are the consequences of not following this policy?

You and the Company can be sued by the owner of the copyright for damages for unauthorised use of the copyrighted material.

Failure to follow these rules may lead to disciplinary action being taken against you including your dismissal.

Entering Contracts

What is a contract?

A contract is an agreement between two or more parties to create legal obligations between them. Contracts can be made orally or in writing. Binding contracts can be formed by e-mail.

E-mail may appear informal but you must take care not to enter contractual obligations without the usual care and attention to detail necessary to protect the Company's interests.

Rules for contracting by e-mail

- Do take care when negotiating contracts by e-mail and take legal advice or advice from your manager before entering contractual commitments.
- If you conduct contractual negotiations via e-mail or use e-mail to communicate with third parties in circumstances where a contract may be formed, you must include the statement "subject to contract" in all such e-mails until such time as it is intended that a binding contract should come into existence.
- If you conduct negotiations to settle a dispute via e-mail, you must include the statement "without prejudice" in all such e-mails until such time as it is intended that a binding settlement should come into existence.
- Where you intend that a binding contract should come into existence, you must include the following statement "This contract is made in England and Wales and shall be interpreted in accordance with the laws of England and Wales. The parties submit to the non-exclusive jurisdiction of the English Courts."
- Before entering into a binding contract via e-mail you must be satisfied of the legal identity of the other contracting party. Unless an established digital signature protocol is in place, this will normally be by signed confirmation by the other contracting party that they will be bound by e-mails sent from, or purporting to be sent from your e-mail address.
- If you are entering into a binding contract, then you will be required to attach an appropriate digital signature to the message. You must obtain authorisation.

What are the consequences of not following this policy?

If you do not follow the above rules, you may bind the Company to contractual obligations. If the Company then fails to honour those obligations, the Company could be sued for breach of contract.

If you compromise a settlement of a legal dispute, the Company may have to pay out more than it should or may be unable to recover as much money as it should.

Failure to follow these rules may lead to disciplinary action being taken against you including your dismissal.

Pornography

What is pornography?

As there can be no possible legitimate business use for accessing or transmitting sexually explicit materials at work, the question of whether or not sexual material constitutes pornography is not relevant to use of Company e-mail and internet access.

What you must not do

Do not access or transmit any material with a sexual content.

What are the consequences of not following this Policy?

- Accessing and transmitting sexual material may be a criminal offence for which both you and the Company could be liable.
- The display on screen of sexual material or the transmitting of such material to other people may constitute sexual harassment (see the harassment section of this Policy).
- Failure to follow these rules may lead to disciplinary action being taken against you including your dismissal.

Confidential Information

What is confidential information?

In general terms, confidential information includes any information which is not available to the public. Information which is highly confidential is information which would damage the Company's business if it became known to our competitors.

Confidential information includes [price lists, development strategies]. This is not an exhaustive list.

What you must do and what you must not do

- Do ask your manager if you are not sure whether information is Confidential.
- Do Not send any documents of a highly confidential nature by email, except where they are encrypted and you are authorised to do so by your manager. 'In Confidence'

or 'In Strictest Confidence' should be selected from the classification list prompt when sending an e-mail.

- No other person is authorised to decrypt this message and unauthorised decryption is prohibited and may be unlawful. Unauthorised decryption will not waive privilege or confidentiality."

What are the consequences of not following this Policy?

Confidential information is one of the Company's most valuable assets. If that information becomes public, it may affect the Company's competitiveness and put at risk the livelihoods of you and all of your colleagues.

Failure to follow these rules may lead to disciplinary action being taken against you including your dismissal.

Amendments

The Company may amend this Policy at any time.



Rebekah Wallis
Director - People & CR

Whistleblowing Policy and Procedure

1. Scope

All Employees

2. Purpose

Policy Statement

Ricoh Europe expects all its employees and directors to abide by internal and external rules and regulations at all times as stated in the Ricoh Code of Conduct. However, all organisations face the risk of their activities going wrong from time to time, or of malpractice. Employees are often the first to notice these situations. However, they may feel that speaking up would be disloyal to colleagues or to Ricoh and it may be easier to ignore the concern rather than report what may be a reasonable suspicion of malpractice.

Employees and directors of Ricoh Europe have a responsibility to ensure the success of the organisation and therefore have the right and responsibility to report suspicions regarding alleged irregularities of a general, operational and/or financial nature. This is what we call 'whistleblowing'.

This policy provides mechanisms under which genuine concerns can be raised both internally and through an external whistleblowing service. It also aims to provide safeguards to employees who raise such concerns and those about whom such concern may be raised.

3. **Policy**

Malpractice

Malpractice is improper, illegal or negligent professional activity. The following are examples of malpractice:

1. criminal offences that have been, are being or are likely to be committed (for example fraud, financial irregularity, corruption, bribery or blackmail);
2. failure to comply with a legal or regulatory obligation in the local jurisdiction;
3. improper accounting and auditing related matters;
4. miscarriage of justice;
5. endangering the health and safety of an individual;
6. endangering the environment;
7. concealment of information relating to any of the above.

This list is intended as a guide and does not contain every type of malpractice you may encounter. Incidents of a similar nature can also be raised using the procedures outlined in this policy.

You should raise a complaint if you are an employee or agency contract worker employed or engaged by Ricoh and you have reasonable grounds to believe that malpractice has occurred, is occurring or is likely to occur in Ricoh (whether on the part of another employee or any other person). Employees are not expected to be able to prove that their allegations are true. However, they must be able to prove that there is sufficient cause to suspect that something is wrong.

Which Procedure should you use to raise your concern?

You should make a report using one of following procedures: **Grievance Procedure (internal)**, **Informal Procedure (internal)**, **Confidential Reporting Procedure (internal)**, or **Hotline Reporting Procedure (external)**. To decide which procedure you should use, consider the concern you want to raise and follow the guidance below.

In all Ricoh entities except those located in Spain we would encourage you to provide the information on a named but confidential basis rather than anonymously, so that your report can be fully investigated (in Spain you must give your name when you make an allegation). However, Ricoh recognises that under some circumstances you may wish to raise your concern anonymously and Ricoh will respect this.

Where you disclose your identity, every effort will be made to keep your identity confidential, at least until any formal investigation is under way. You will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or allegation, it will be necessary to disclose your identity.

Grievance Procedure

You should use the grievance procedure if your complaint relates to your **personal circumstances or employment**. Contact your line manager or your local HR department and they will instruct you as to how to report your complaint.

Informal Procedure

Any complaint can be raised through the informal procedure. This procedure should be used in preference to the Confidential Reporting Procedure or the Hotline Reporting Procedure where it is appropriate. To use this procedure inform your line manager of your concern and they will follow up your complaint or inform you how to proceed.

Confidential Reporting Procedure

To make a report using the Confidential Reporting procedure you should set out your concerns relating to the malpractice in writing in a “malpractice disclosure”. You should include the facts which you believe show malpractice, confirm that you are using the Confidential Reporting Procedure and provide as much supporting evidence as possible about the malpractice.

Your malpractice disclosure should be sent to the **Head of HR, (if the nature of your report means that you cannot send to the Head of HR or the Head of HR is not available you should send it to either the Head of Finance, or the Legal department)** in your jurisdiction, they will ensure that every complaint is handled with strict confidentiality. The HR department will inform you as to how the report will be dealt with.

Whistleblowing Hotline Reporting Procedure

If you feel it is not appropriate to make a report through any of the internal reporting procedures in your local operating company you can report it to a third party through the **Hotline Reporting Procedure**. The Hotline number is available on your local intranet page or in Appendix 1 at the back of this policy.

Only reports relating to financial and accounting issues may be made through the hotline.

When you call the hotline you will speak to an individual who is not an employee of Ricoh and you will be able to make your report in your native language. They will record all the details of your allegation and report it to the Group Legal Department. A unique report number will be given to you so that you can phone back to provide more information or to find out how your report has been followed up.

AFTER YOU HAVE REPORTED MALPRACTICE THROUGH THE HOTLINE REPORTING PROCEDURE

The Legal officer responsible will whenever practical inform the employee to which the report relates that an allegation has been made about them. They will also be told who will receive a copy of any subsequent internal report in which their personal data appears and about their right to access and rectify information appearing in such a report.

If there is a substantial risk that informing the employee about the allegation would jeopardise Ricoh's ability to investigate the complaint then the employee to whom it relates will not be informed.

The Legal Officer responsible will recommend what further steps are to be taken. Such recommendations may (without limitation) include one or more of the following:

- the matter be reported to the police, and/or;
- the matter be investigated further internally by Ricoh or by external auditors or investigators appointed by Ricoh;
- if it is found that your report relates to your own personal circumstances rather than malpractice within Ricoh you will be directed to raise your complaint through the Grievance Procedure;
- a recommendation of no further action may be made if the Legal Officer is (i) satisfied that the malpractice has not occurred or is not likely to occur; (ii) is aware that the malpractice is already subject to proceedings, or has already been referred to the police or relevant external body; (iii) is satisfied that you do not have a reasonable grounds to believe that malpractice has occurred; and/or (iv) is satisfied that you are not acting in good faith.

If a recommendation is made that no further action be taken, any information relating to the investigation will be destroyed within two months. If further action is to be taken any information collected (including computer files and disks) will be kept confidentially and securely for only as long as any disciplinary action or judicial process, or further action of whatever nature is being carried out, or for as long as required by law.

Information collected following a malpractice disclosure will only be kept past this date if there is a material risk of liability or harm to Ricoh in the future.

Any recommendations or actions under this procedure will be made to the Managing Director of the relevant jurisdiction unless it is alleged that the Managing Director is involved in the alleged malpractice in which case the recommendations or actions will be made to the European Board of Directors. You will be informed of the steps taken or if no steps are taken the reason for this.

PROTECTION AGAINST REPERCUSSIONS FOR MAKING A DISCLOSURE

No repercussions will be imposed and no disciplinary action will be taken against you because of a malpractice disclosure made in accordance with the procedures set out in this policy. If you do experience repercussions you should contact your line manager or HR as the company will do all it can to protect an individual in these circumstances. This will not, however, prevent Ricoh from bringing disciplinary action in cases where there are grounds to believe that a malpractice disclosure has been made maliciously, in bad faith or with a view to personal gain or where external disclosure is made in breach of this procedure without reasonable grounds.

If, following investigation, it is concluded that you have made a malpractice disclosure maliciously, in bad faith or with a view to personal gain you will be subject to disciplinary action, and possible sanction up to and including dismissal.



Rebekah Wallis
Director - People & CR

APPENDIX 1

WHISTLEBLOWING HOTLINE TELEPHONE NUMBERS

All numbers are charge free

No area or international dialling codes are required

COUNTRY	TELEPHONE NUMBER
AUSTRIA	0800 298 684
BELGIUM	0800 7 1417
DENMARK	80 885619
FINLAND	08001 1 6575
FRANCE	0800 90 1703
GERMANY	0800 187 3586
HUNGARY	06 800 17830
IRELAND	1 800 558 549
ITALY	800 788340
LUXEMBOURG	800 2 7328
NETHERLANDS	0800 022 5890
NORWAY	800 18540
POLAND	0 0 800 111 1561
POTUGAL	800 8 11215
SOUTH AFRICA	0800 980 082
SPAIN	900 97 1031
SWEDEN	020 79 0631
SWITZERLAND	0800 56 1525
UNITED KINGDOM	0808 234 7051

Dignity at Work Policy

1. Scope

All employees, temporary employees, contractors, clients and visitors.

This policy covers bullying and harassment of and by managers, employees, contractors, agency staff and anyone else engaged to work at the Company, whether by direct contract with the Company or otherwise. If the complaint or alleged harasser is not employed by the Company, eg if the worker's contract is with an agency, this policy will apply with any necessary modifications.

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, eg business trips and work related social events.

2. Purpose

The Company believes that all people have the right to be treated with dignity and respect, and are aware that harassment in its many forms has a detrimental and negative effect on individuals and therefore their productivity.

The Company is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

The Company will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. The Company will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

3. Policy

What is bullying and harassment?

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- Has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or
- Is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Different people find different

things acceptable. Everyone has the right to decide what behaviour is acceptable to him or her and have to his or her feelings respected by others. Behaviour which any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to him or her, eg sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, eg certain “banter”, flirting or asking someone for a private drink after work. In these cases, first time conduct which unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to him or her.

Harassment may also occur where a person engages in unwanted conduct towards another because he/she perceives that the recipient has a protected characteristic (for example, a perception that he or she is gay or disabled), when the recipient does not, in fact, have that protected characteristic. For example, it would be harassment for an individual to tease repeatedly an individual because of an incorrect belief that the recipient is deaf. Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example if his/her child is disabled, wife is pregnant or friend is a devout Christian.

Harassment also includes circumstances where an individual is subjected to unwanted conduct from a third party, such as a client or customer. For example, it might be that a client makes a series of racist remarks to a black employee. If an employee feels that he/she has been bullied or harassed by customers, suppliers, vendors or visitors, he or she should report any such behaviour to their manager who will take appropriate action. Bullying or harassment of customer, suppliers, vendors or visitors or other will be dealt with through the disciplinary procedure.

A single incident can be harassment if it is sufficiently serious.

All bullying and harassment is misconduct and is a disciplinary offence which will be dealt with under the Company's disciplinary policy. Bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age. Serious bullying or harassment may amount to civil or criminal offences, eg a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.

Examples of bullying or harassment

Bullying and harassment may be misconduct that is physical, verbal or non-verbal, eg by letter or email.

Examples of unacceptable behaviour that are covered by this policy include (but are not limited to):

- Physical conduct ranging from unwelcome touching to serious assault
- Unwelcome sexual advances
- Demeaning comments about a person's appearance
- Unwelcome jokes or comments of a sexual or racial nature or about an individual's age, disability, sexual orientation or religion

- Questions about a person's sex life
- Unwanted nicknames related to a person's age, race, nationality, disability
- The use of obscene gestures
- Excluding an individual because he/she is associated or connected with someone with a protected characteristic, e.g., his/her child is gay or parent is disabled
- Ignoring an individual because he/she is perceived to have a protected characteristic when he/she does not, in fact have the protected characteristic. For example an employee is thought to be Jewish, or is perceived to be gay
- Spreading malicious rumours or insulting someone

What is Victimisation?

Victimisation is subjecting a person to a detriment because he/she has, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing him/her or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because he/she has made a complaint or giving him/her a heavier or more difficult workload.

Provided that you act in good faith, ie you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the Company will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

Making a complaint that you know is untrue, or giving evidence that you know to be untrue, may lead to disciplinary action being taken against you.

What should I do if I think I am being bullied or harassed?

Informal complaints process

You maybe able to sort out matters informally. The person may not know that his or her behaviour is unwelcome or upsetting. An informal discussion may help him or her to understand the effects of his or her behaviour and agree to change it. You may feel able to approach the person yourself, or with the help of someone in HR, a manager or another employee. Alternatively, an initial approach could be made on your behalf by one of these people. You should tell the person what behaviour of his or hers you find offensive and unwelcome, and say that you would like it to stop immediately. You may want to add that if the behaviour continues, you intend to make a formal complaint to your manager or HR.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the Company's grievance procedure.

Formal complaints process

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will be kept informed of the general progress

of the process of investigation and the outcome of any disciplinary proceedings.

The Company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a “need to know” basis. Every effort shall be made to protect the legitimate rights of all parties involved. In particular the following principles shall be adhered to:

- The roles of natural justice shall apply to all investigations in that those involved in the process will have the right to explain or defend their actions, there will be the right to be represented and both parties shall have the right of appeal;
- During the whole of the investigation process, the complainant, the person against whom the allegations have been made and any others interviewed shall be entitled to be accompanied at any stage of the investigation by a colleague or trade union representative;
- Allegations will be considered against the principles of reasonable belief and the balance of probabilities.

If your complaint is upheld, and the person found to have bullied or harassed you remain in the Company’s employment, consideration will be given to changing the reporting line. This consideration will take into account business need and the nature and seriousness of the complaint. Alternative options will also be discussed with the complainant.

Where it is considered that there may have been misconduct or gross misconduct by an employee, the matter may be considered at a disciplinary hearing

If your complaint is not upheld, the HR department will support you, the alleged harasser and your manager(s) in making arrangements for you both to continue or resume working and to help rebuild working relationships.

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint which you know to be untrue may lead to disciplinary action being against you.

Appeal-process

The individual raising the complaint and the person who the allegations have been made has a right of appeal against the decision. The purpose of the appeal is, therefore, to consider whether the process of the investigation was fair and/or whether the conclusions and recommendations are reasonable in all of the circumstances. The purpose is not to reinvestigate the complaint.

Confidentiality

Claims of bullying or harassment will always be treated seriously and dealt with in the utmost confidence. Confidentiality is vitally important to provide all parties concerned with a degree of security and to ensure that all procedural aspects are dealt with sympathetically, impartially and objectively. Any breaches of confidentiality will be treated seriously and may result in disciplinary action.

“Confidentiality” relates to the details of the case and investigation. Appropriate steps will be taken so that only those who are required to know details of a case will have access to

information, including both the complainant and the person against whom the allegations have been made. Anonymity cannot be guaranteed, especially where there may be a breach of the laws or where criminal proceedings may be initiated.

What can I do to help stop bullying and harassment?

We all have responsibility to help create and maintain a work environment free of bullying and harassment. You can help to do this by:

- being aware of how your own behaviour may affect others and changing it, if necessary – you can still cause offence even if you are “*only joking*”,
- treating your colleagues with dignity and respect

Responsibility of all employees

We all have responsibilities to help create and maintain a work environment free of bullying and harassment. You can help do this by:

- Being aware of how your own behaviour may affect others and changing it, if necessary – you can still cause offence even if you are “only joking”
- Treating your colleagues with dignity and respect
- Taking a stand if you think inappropriate jokes or comments are being made
- Making it clear to others when you find their behaviour unacceptable
- Intervening, if possible, to stop harassment or bullying and giving support to recipients
- Making it clear that you find harassment and bullying unacceptable
- Reporting harassment or bullying to your manager or HR and supporting the Company in the investigation to complaints
- If a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

Managers have a particular responsibility to:

- Set a good example by their own behaviour
- Ensure that there is a supportive working environment
- Make sure that staff know what standards of behaviour are expected of them
- Intervene to stop bullying or harassment
- Report promptly to HR any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

What happens if I am accused of bullying or harassment?

If someone approaches you informally about your behaviour, do not dismiss the complaint out of hand because you were only joking or think the complainant is being too sensitive. Remember that different people find different things acceptable and everybody has the right to decide what behaviour is acceptable to him or her and to have his or her feeling respected by others. You may have offended someone without intending to. If that is the case the person concerned may be content with an explanation and an apology from you an assurance that you will be careful in the future not to behave in a way that you now know may cause offence. Provided that you do not repeat the behaviour which has caused offence, that may well be the end of the matter.

If a formal complaint is made about your behaviour, this will be fully investigated and the Company may bring disciplinary proceedings, if appropriate. The Company will follow its disciplinary procedure and you will have the rights set out in the procedure. The procedure will be implemented at the appropriate stage for the seriousness of the allegation. Complaints of bullying and harassment could be allegations of gross misconduct that, if proved could lead to dismissal without notice. If the allegation is considered to be one of gross misconduct, you may be suspended on full pay during the investigation and, if a disciplinary hearing is to be called, until disciplinary proceedings have been concluded.

If the complaint against you is upheld, on a balance of probabilities, a disciplinary penalty may be imposed up to and including dismissal, having regard for the seriousness of the offence and all relevant circumstances. If the complaint is upheld, but you are not dismissed, the Company may decide to consider the following options:

- Mediation
- Demotion
- Transfer you to another post
- Require that you undergo further training on diversity / dignity at work
- Bonus payment effected

If the complaint against you is not upheld, the HR department will support you, the complainant and your manager(s) in making arrangements for you both to continue or resume working to help repair working relationships.

If a complaint is made against you that is not upheld, and the Company has good grounds for believing that the complaint was not made in good faith, the Company will take disciplinary action against the person making the false complaint.

You must not victimise a person who has made a complaint in good faith against you or anyone who has supported him or her in making the complaint or given evidence in relation to such a complaint. Disciplinary action will be taken against you if the Company has good reason to think you may have victimised the complainant or someone else.

Some types of bullying or harassment may constitute unlawful discrimination and allegations may give rise to the possibility of other civil claims or criminal proceedings against you, which would proceed independently of the Company's disciplinary proceedings. You could be personally liable to pay compensation to the complainant if a successful claim in the employment tribunal or other courts was brought against you. Criminal proceedings could lead to conviction and criminal penalties.

Review

This policy will be monitored by the Company to ensure its effectiveness and will be updated in accordance with changes in the law. If changes are required, the Company will implement them and inform all employees.



Rebekah Wallis
Director - People & CR

Dear Employee,

Ricoh UK want to ensure that we offer an inclusive culture for all employees, future employees and clients. Our aim is to create a culture which truly acknowledges and values the full range of differences between people within our organisation, workplaces in general and the wider society.

In order to achieve our aim, Ricoh UK needs to build an accurate picture of the make-up of its workforce and we need your help and co-operation to enable us to do this. Please can you complete the below diversity questionnaire by placing a cross in the appropriate boxes.

Please note that any data collected is held confidentially and stored securely by the Ricoh UK HR team.

Diversity Questionnaire

Ethnic Group

Choose one of the following answers:

- ☐ White – English / Welsh / Scottish / Northern Irish / British
- ☐ White – Other
- ☐ White – Gypsy or Irish Traveller
- ☒ White – Irish
- ☐ Asian / Asian British – Chinese
- ☐ Asian / Asian British – Other
- ☐ Asian / Asian British – Pakistani
- ☐ Asian / Asian British – Bangladeshi
- ☐ Asian / Asian British – Indian
- ☐ Black / African / Caribbean / Black British – African
- ☐ Black / African / Caribbean / Black British – Other
- ☐ Black / African / Caribbean / Black British – Caribbean
- ☐ Mixed / Multiple Ethnic Group – White and Asian
- ☐ Mixed / Multiple Ethnic Group – Other
- ☐ Mixed / Multiple Ethnic Group – White and Black Caribbean
- ☐ Mixed / Multiple Ethnic Group – White and Black African
- ☐ Other Ethnic Group – Other
- ☐ Other Ethnic Group – Arab
- ☐ Decline to answer

What is your religion or belief?

Choose one of the following answers:

- ☐ No religion
- ☐ Christian
- ☐ Protestant
- ☒ Roman Catholic
- ☐ Buddhist
- ☐ Hindu
- ☐ Jewish
- ☐ Muslim
- ☐ Sikh
- ☐ Other
- ☐ Decline to answer

Which of the following best describes how you think of yourself?

Choose one of the following answers:

- ☒ Heterosexual (or straight)
- ☐ Homosexual (or gay/lesbian)
- ☐ Bisexual
- ☐ Other
- ☐ Decline to answer

What is your current marital status?

Choose one of the following answers:

- ☐ Single
- ☒ Married
- ☐ Separated
- ☐ Civil Partner
- ☐ Divorced
- ☐ Widowed
- ☐ Other
- ☐ Decline to answer

Do you consider yourself to have a disability according to the definition in the Equality Act?

The Equality Act 2010 generally defines a disabled person as someone who has a mental or physical impairment that has a substantial and long-term adverse effect on the person's ability to carry out normal day-to-day activities.

You should choose 'Yes' even if you feel that your condition does not limit you in any way.

- ☐ Yes
- ☒ No

Do you require a reasonable workplace adjustment?

- ☐ Yes
- ☒ No

If 'Yes' please provide details below:

The information in this form is for monitoring purposes only.

Mary Farrelly
Mary Farrelly (Jul 14, 2019)

NEW STARTER DOCUMENTATION CHECKLIST

Please complete the following checklist and forward to the Resourcing Administrator at the Northampton office, along with all relevant documentation. (please tick where appropriate) **Please note failure to provide the following information/documentation will delay the processing of your details and result in non-payment of salary.**

Name: Mary Farrelly
Start Date: Jul 14, 2019
Job Title: Sales Director
Department: Sales

I hereby enclose the following documentation:

Signed Policy form



Next of Kin Details

Please provide current next of kin details so that, in the event of an emergency we can contact on your behalf.

Contact One:

Name: Leslie Fleming
Address: 31 Delvin Banks, Naul, Co. Dublin, K32 RD28, Ire
Phone Number:
Mobile Number: 00353876080117
Relationship to you: Husband

Contact Two:

Name:
Address:
Phone Number:
Mobile Number:
Relationship to you:

Signature: Mary Farrelly
Mary Farrelly (Jul 14, 2019)

Email: mfarrellyfleming@gmail.com



Employee Details

Employee Name:

Benefit Grade:

Employee Number:

Job Title:

1. Pension scheme

Would you like to join the Bank of Ireland PRSA?

Yes ☐

No ☐

If yes, please specify your contribution rate

3% ☐

5% ☐

other ☐ %

***If you decide to contribute 3% or 5% of your salary, the Company will match this. The maximum contribution from the Company will be 5%.**

2. Holidays

Please select number of additional holiday you would like to buy

0 ☐

1 ☐

2 ☐

If your role is between grade A-D, please see option 3

If your role is a grade E or below, please see option 4

3 Private Medical Insurance (PMI)

Grades **A-B** You are entitled to Family cover. Would you like to opt in?

Yes ☐

No ☐

Grades **C-D** You are entitled to Single cover. Would you like to opt in?

Yes ☐

No ☐

4 Health Cash Plan

Grades **E** or below, would you like to opt in?

Yes ☐

No ☐

Please ensure you have completed the HSF application form and returned it to HSF

Please return this form ASAP to ensure you are enrolled into your chosen benefits.

I am opting in to the above benefit selections with effect from 1st April 2017.

Employee Name

Date and Signature



Policy and Procedures Checklist

Name: Mary Farrelly

Position: Sales Director

Please ✓ to acknowledge that you have received the following documentation, and have read and understood the contents:

Diversity Policy	<input checked="" type="checkbox"/>
Dignity At Work Policy	<input checked="" type="checkbox"/>
Email & Internet Policy	<input checked="" type="checkbox"/>
IT Equipment Policy	<input checked="" type="checkbox"/>
Whistle blowing Policy	<input checked="" type="checkbox"/>
Code of Conduct Policy	<input checked="" type="checkbox"/>
Health & Safety Booklet	<input checked="" type="checkbox"/>

Signature: Mary Farrelly
Mary Farrelly (Jul 14, 2019)

Email: mfarrellyfleming@gmail.com