



Ricoh India

Anti – Corruption Policy

Date: 12/12/2016



Anti-Corruption Policy

1. Policy Statement

The purpose of this policy is to protect Ricoh India Limited (Ricoch India) from breaches of bribery and anti-corruption laws. Ricoh India does not tolerate any form of corruption and/ or bribery and is committed to complying with applicable bribery and anti-corruption laws in all countries in which Ricoh India conducts business.

Ricoh India requires its Employees (defined below) at all times to act honestly and with integrity. Ricoh India will not tolerate any Employee or Third Party (defined below) being involved in any level of bribery or corruption. Employees and Third Parties are required to report any circumstances which are in breach of Ricoh India's Anti-Corruption Policy. All reported incidences of actual or suspected bribery or corruption will be promptly and thoroughly investigated and dealt with appropriately.

2. Application of this Policy

This policy applies to all Employees of Ricoh India and Third Parties performing duties for or on behalf of Ricoh India whether or not directly employed by Ricoh India.

This policy extends to all Ricoh India Limited and Employees wherever located, regardless of geographical location.

3. Definitions of Terms Used in this Policy

Bribe: This includes:

- Offering, promising or giving anything of value to improperly influence another in order to obtain business for Ricoh India; or
- Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by Ricoh India.

Bribes can include money, gifts, hospitality, entertainment, expenses, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

Employees: All workers performing duties on behalf of Ricoh India, whether or not employed directly by Ricoh India.

Facilitation Payments: Payments that are requested by Government Officials (whether in India or overseas countries) to speed up a routine government action such as:

- Processing licenses, permits, or other official documents;
- Processing government paperwork such as visas and work orders; and



- Providing services such as police protection and mail pick-up and delivery.

Government Officials: Officials of any government department or agency; officials of any public international organisation (e.g., the United Nations); political parties and party leaders; candidates for public office; executives and employees of government-owned or government-run companies (such as a doctor in a state-controlled hospital); anyone acting on behalf of any of these officials; and an individual holding a legislative, administrative or judicial/ quasi-judicial position; any person who is remunerated out of public money and/or government funds or who performs a public duty.

Third Party/Parties: Include agents; brokers; partners; consultants; contractors; joint venture partners; and other representatives performing work for the benefit of Ricoh India.

4. Bribery and Corruption

It is illegal to pay or receive a Bribe whether paid or received directly or indirectly. There is no need for the Bribe to be successful to be viewed as corrupt.

These principles apply equally in any jurisdiction in which Ricoh India operates or carries on business.

5. Facilitation Payments

It is illegal to make any sort of payment or give anything of value to a Government Official where this is to obtain or retain business or some other commercial advantage for Ricoh India.

In some countries, it may be customary for Government Officials to request Facilitation Payments. However, Facilitation Payments made anywhere in the world are prohibited by Ricoh India and you must not make payments regardless of local custom.

6. Gifts, Hospitality, Entertainment and Travel Expenses

All business gifts, hospitality, business entertainment and travel expenses must comply with Ricoh India's Policy on Gifts and Hospitality.

Provision of business gifts, hospitality and business entertainment to a Government Official is prohibited and may be considered a Bribe unless prior authorisation is obtained from the General Counsel who will determine whether the proposed activity is permissible under applicable laws.

7. Political and Charitable Donations

Political and charitable donations are allowed provided the donation is not made for the personal, financial, or political benefit of any Government Official, or any customer/supplier/Third Party (or their families). Donations must not be made to improperly influence the recipient or in exchange for any business advantage.



Prior approval from you're the General Counsel must be obtained before requesting or authorising any donations.

8. Third Party Payments, Use of Agents and Due Diligence

You must not make a payment to a Third Party if you know or suspect that the person may use or offer all or a portion of the payment directly or indirectly as a Bribe.

It is your responsibility to ensure that Third Parties engaged on behalf of Ricoh India are legitimate service providers. Before engaging any such party you are required to undertake appropriate due diligence checks. This will include a corruption risk assessment of factors including the country in which the business is to be conducted, the Third Party's potential business partners and the nature of the proposed project or transaction. All paperwork and records documenting the due diligence checks and risk assessment should be retained for six years.

When dealing with Third Parties, the below red flags should act as a checklist (as part of your due diligence referred to above) as indicators of potential violations of anti-bribery or anti-corruption laws include:

- A Government Official recommends that Ricoh India hires a specific third party;
- The proposed compensation of a Third Party retained by Ricoh India is unreasonably high compared to the market rate without a reasonable explanation;
- A Third Party retained by Ricoh India requests that payments be made off-shore; to an unknown third party; be split among multiple accounts; be made to an account in a country other than where the third party or agent is located or business is to be performed; or any other unusual financial arrangements;
- A Third Party that Ricoh India seeks to retain lacks qualifications or staff to perform the expected services;
- A Third Party relies heavily on political or government contacts instead of technical skills or time invested;
- Upon checking references, you find that the Third Party has an unsavoury reputation or is not well known in the industry;
- A Third Party that Ricoh India seeks to retain will not agree to terms requiring compliance with anti-corruption laws;
- A country in which Ricoh India is conducting or seeks to conduct business is a high risk location for corruption; or



- The same Third Party is repeatedly used for business without any reasonable justification for their repeated appointment.

If you are in any doubt whatsoever about the legitimacy of a proposed Third Party you must discuss your concerns with the General Counsel prior to entering into any arrangements with the Third Party.

You should ensure that any Third Party acting on Ricoh India's behalf receives a copy of this policy. As a matter of course you should also provide a copy of this policy with any new agreement entered into with a Third Party.

9. Recordkeeping

All payments made or received by Ricoh India must be accurately recorded in Ricoh India's financial books and records. All financial transactions must be authorised by appropriate management in accordance with internal control procedures.

10. Obligations to Report Breaches of Anti-Corruption Laws

Employees and Third Parties are required to draw attention to circumstances where they believe that there may have been breaches of this Policy or related improper behaviour by other Employees or Third Parties and can use Ricoh India's Whistleblowing Policy.

In addition you can report any instances of suspected corruption to your local management or to Ricoh India senior management.

All matters will be dealt with in confidence and in strict accordance with relevant legislation, which protects the legitimate personal interests of employees.

11. Consequences for Breaches of Anti-Corruption laws

Consequences for individuals: Consequences may include unlimited fines for corporations and/or individuals, imprisonment for terms as prescribed under applicable laws which may extend to 10 years for individuals and/or directors, disqualification from acting as a director and significant monetary fines against you as an individual. You would also be subject to disciplinary action, up to and including dismissal from the company.

Consequences for Ricoh India: Consequences may include the company facing unlimited fines, damage to the corporate brand and reputation of Ricoh Group, loss of the ability to trade in certain jurisdictions, debarment from bidding for government contracts, loss of business, legal action by competitors, litigation and substantial investigation expenses.

In addition, under certain anti-corruption laws, the directors and senior officers of Ricoh India can be held personally liable for the breaches committed by Employees and Third Parties and face significant fines and/or imprisonment.



12. Enforcement and Discipline

Ricoh India views corruption and bribery very seriously. Ricoh India will investigate all allegations of corruption and take legal and/or disciplinary action in all cases where it is considered appropriate. Where a case is referred to the police or other law enforcement agency, Ricoh India will co-operate fully with the criminal investigation which could lead to the Employee being prosecuted.

13. Responsibilities and Review

The General Counsel has been appointed as the designated Anti-Corruption Officer for Ricoh India. It shall be the responsibility of the Anti-Corruption Officer to review this policy and its implementation on an annual basis to ensure it continues to comply with relevant bribery and anti-corruption laws.

14. Questions and Information

If you want to ask a question about the requirements in this policy or are concerned that an anti-bribery breach is occurring or has occurred, you should report it immediately to one of the following:

- Your local management;
- The whistleblowing system set out in the Whistleblowing policy; or
- The General Counsel, who is the Anti-Corruption Officer for Ricoh India.

XXXXXXXXXXXX