



RICOH Europe

Whistleblowing Policy and Procedure

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1. POLICY STATEMENT

- 1.1 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.
- 1.2 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'.
- 1.3 This policy and the aforementioned responsibility also apply to persons who are not current employees but also to those who otherwise engage in or have engaged in work-related activities with or for Ricoh, such as self-employed (contract) workers, freelancers, former employees, customers, suppliers, consultants, job applicants, volunteers and interns.
- 1.4 This policy provides mechanisms under which genuine concerns can be raised both internally and, if there are valid reasons not to use the internal procedures, through an external channel. It also aims to provide safeguards to reporting persons who raise such concerns and those about whom such concerns may be raised.

2. MALPRACTICE

- 2.1 Malpractice is improper, illegal, or negligent professional activity. The following are examples of malpractice:
 - 2.1.1 criminal offences that have been, are being or are likely to be committed (for example fraud, financial irregularity, corruption, bribery, money laundering, terrorist financing or blackmail);
 - 2.1.2 failure to comply with a legal or regulatory obligation in the local jurisdiction;
 - 2.1.3 improper accounting and auditing related matters;
 - 2.1.4 miscarriage of justice;



- 2.1.5 undermining fair public procurement
 - 2.1.6 endangering public health or safety of an individual;
 - 2.1.7 endangering the environment;
 - 2.1.8 insufficient care for product and transport safety
 - 2.1.9 insufficient protection of privacy and personal data and security of network and information systems;
 - 2.1.10 unauthorised disclosure of confidential information
 - 2.1.11 concealment of information relating to any of the above.
- 2.2 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.
- 2.3 You should raise a complaint if you have reasonable grounds to believe that malpractice has occurred, is occurring or is likely to occur in Ricoh. You are not expected to be able to prove that your allegations are true. However, you must be able to demonstrate that there is sufficient cause to suspect that something is wrong.

3. WHICH PROCEDURE SHOULD YOU USE?

- 3.1 You should make a report using one of the procedures listed under paragraph 4 to 6, or, if these are not appropriate, under paragraph 8. To decide which procedure you should use, consider the concern you want to raise and follow the guidance below. The various procedures will allow you to report either in writing, via telephone, an online portal or through a physical meeting.
- 3.2 If you, after reading the guidance below, are unsure on how to report a suspicion or what protection is provided to you, you can consult the Regional Legal Manager responsible for your country who will offer guidance and advice on a confidential basis. The Regional Legal Managers, their contact details and the regions they look after are listed in **Appendix 1**.
- 3.3 In all Ricoh entities 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. However, Ricoh recognises that under some circumstances you may



wish to raise your concern anonymously and Ricoh will respect this. If you choose to report anonymously, please use the third-party whistleblowing reporting procedure and choose the option that you want to report anonymously.

- 3.4 Where you do disclose your identity, every effort will be made to keep your identity confidential, unless you agree to disclosure of your identity. There may be circumstances in which, because of the nature of the investigation or allegation, it will be necessary to disclose your identity, in which case you will be informed of this. You will be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential.

4. INFORMAL PROCEDURE

- 4.1 Any complaint can be raised through the informal procedure. To start this procedure call, write to or schedule a meeting with the Regional Legal Manager for your country and notify him or her that you want to report a malpractice. If you would like to do so; you can invite your line manager, a colleague, or a union representative. The Regional Legal Manager will discuss the relevant facts about the (suspected) malpractice, formally receive your report and follow up as appropriate.

5. THIRD-PARTY WHISTLEBLOWING REPORTING PROCEDURES

- 5.1 If you feel it is not appropriate to report a malpractice through the informal reporting procedure you can report it directly to a third party through either the **Telephone Hotline Reporting channel** or the **Online Reporting channel**.
- 5.2 The telephone number of the Telephone Hotline is available on your local intranet page and in **Appendix 2** at the back of this policy. When you call the Telephone 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. This individual will record all the details of your allegation and report it to the VP Legal & General Counsel. 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.
- 5.3 The web address for the Online Reporting channel can be found [here](#). When you file an Online Report, the report will be received by an independent company who will provide details of your allegation and report it to the VP Legal & General Counsel. You will have the option of creating a password so that you can log in later to provide more information or to find out how your report



has been followed up. The Online Report has an option to submit the report anonymously.

6. GLOBAL INTERNAL REPORTING PROCEDURE

- 6.1 If a concern relates to improper conduct or action which could cause serious loss to business or damage to Ricoh's reputation, including organization-wide fraud, or fraud by top-management, a report can also be submitted directly to Ricoh Company Ltd through the **Online Reporting channel** [here](#).
- 6.2 If a concern falls under the above scope for reporting directly to Ricoh Company Ltd. you need to submit the Online Report by visiting the Online Reporting channel, where you will need to select the following:
- 6.2.1 for both the region and location of the concern: "*Others / Global*"; and
 - 6.2.2 for the company the concern relates to: "*Ricoh Company Ltd.*"; and
 - 6.2.3 for the department that needs to receive the report: "*the Audit & Supervisory Board member of RCL*"
- 6.3 Reports made using the aforementioned Global Internal Reporting Procedure will be received by Audit and Supervisory Board Members of Ricoh Company Limited. The recipient shall decide whether the issue can be effectively investigated internally by Ricoh, or whether the investigation may be compromised by internal involvement. Where the recipient decides that the issue can be investigated effectively internally within EMEA by Ricoh, the recipient shall work with VP Legal & General Counsel (EMEA) - this will involve resolving the matter in accordance with clause 7 below. Where the recipient decides that the investigation may be compromised if investigated internally within EMEA, he or she shall either work internally with relevant investigators of Ricoh Company Ltd, or, where required, with an independent external legal advisor who is an expert in the subject matter of the issue, to investigate.

7. AFTER YOU HAVE REPORTED

- 7.1 Regardless which reporting procedure you've used, you will receive an acknowledgment of receipt for your report within seven days, starting from the moment that you submit the report.
- 7.2 Whenever practical, the person(s) to which the report relates will be informed 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.



- 7.3 If there is a substantial risk that informing the person(s) about the allegation would jeopardize Ricoh's ability to investigate the complaint, then the person(s) to whom it relates will not be informed.
- 7.4 Group Legal representatives or a member of the Audit & Supervisory Board responsible (depending on the procedure used) will recommend what further steps are to be taken. Such recommendations may (without limitation) include one or more of the following:
- 7.4.1 the matter be investigated further internally by Ricoh or by external auditors or investigators appointed by Ricoh;
 - 7.4.2 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 local complaints procedure or local HR department outside the scope of this whistleblowing policy;
 - 7.4.3 the matter be reported to the police, and/or;
 - 7.4.4 a recommendation of no further action may be made if the relevant Group Legal representative or member of the Audit & Supervisory Board 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 there are not sufficient grounds to believe that malpractice has occurred; and/or (iv) is satisfied that the reporter is not acting in good faith.
- 7.5 Within three months after receiving the acknowledgment of receipt the reporter will be informed about the status of the investigation and, if applicable, any follow-up actions.
- 7.6 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.



- 7.7 Information collected following a malpractice disclosure will only be kept past the abovementioned dates if there is a material risk of liability or harm to Ricoh in the future.
- 7.8 Any recommendations or actions under the whistleblowing procedures will be made to the relevant CEO or Managing Director of the relevant jurisdiction unless it is alleged that this CEO or Managing Director is involved in the alleged malpractice. The European Board of Directors will also be informed of the recommendations and/or actions taken. You will be informed of the steps taken or if no steps are taken the reason for this.

8. EXTERNAL REPORTING

- 8.1 In addition to the internal reporting procedures (Informal, Telephone Hotline, Online Reporting, including direct to Ricoh Company Ltd.), external reporting through specific authorities is open to any reporter. However, external reporting should only be considered if there are compelling reasons not to use the internal procedures or if a reporter has grounds to believe that the follow-up of the report was materially in breach of this policy or local laws.
- 8.2 The Regional Legal Manager for your country, in line with paragraph 3.2, will guide you towards the appropriate external channel where needed, as this may depend on the circumstances and topic of the report.

9. PROTECTION AGAINST REPERCUSSIONS

- 9.1 No repercussions will be imposed and no disciplinary action will be taken against reporters because of a malpractice disclosure made in accordance with the procedures set out in this policy. If you do experience (threats of) repercussions you should contact your line manager or HR as the company will do all it can to protect an individual in these circumstances, as you are legally protected from repercussions following a report.
- 9.2 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. In which case you will be subject to disciplinary action, and possible sanction up to and including dismissal.



APPENDIX 1

REGIONAL LEGAL MANAGERS

1. Vidal Vicente vidal.vicente@ricoh.es
2. Jenny Kumar jenny.kumar@ricoh-europe.com
3. Farah Manji farah.manji@ricoh-europe.com
4. Arno van Hulten arno.van.hulten@ricoh.nl

COUNTRIES

COUNTRY	REGIONAL LEGAL MANAGER
AUSTRIA	Arno van Hulten
BELGIUM	Farah Manji
CZECH REPUBLIC	Arno van Hulten
DENMARK	Farah Manji
FINLAND	Farah Manji
FRANCE	Vidal Vicente
GERMANY	Arno van Hulten
HUNGARY	Arno van Hulten
IRELAND	Farah Manji
INTERNATIONAL	Jenny Kumar
ITALY (includes San Marino, Vatican City)	Vidal Vicente
LUXEMBOURG	Farah Manji
NETHERLANDS	Arno van Hulten
NORWAY	Farah Manji
POLAND	Jenny Kumar
PORTUGAL	Vidal Vicente
RUSSIA	Jenny Kumar
SLOVAKIA	Arno van Hulten
SOUTH AFRICA	Jenny Kumar
SPAIN	Vidal Vicente
SWEDEN	Farah Manji
SWITZERLAND	Arno van Hulten
TURKEY	Jenny Kumar
UNITED ARAB EMIRATES (UAE)	Jenny Kumar
UNITED KINGDOM	Farah Manji

REGION	VP Legal & General Counsel
EMEA	James Brown james.brown@ricoh-europe.com

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APPENDIX 2

WHISTLEBLOWING HOTLINE TELEPHONE NUMBERS

All numbers are charge free and no area or international dialing codes are required.

COUNTRY	TELEPHONE NUMBER
AUSTRIA	0800 017 896
BELGIUM	0800 13 152
CZECH REPUBLIC	800 400 130
DENMARK	80 83 06 50
FINLAND	08001 1 6575
FRANCE	0800 90 1703
GERMANY	0800 182 3406
HUNGARY	06 800 17830
IRELAND	1 800 443 399
ITALY (includes San Marino, Vatican City)	800 580 236
LUXEMBOURG	800 24 959
NETHERLANDS	0800 022 9935
NORWAY	800 18540
POLAND	0 0 800 111 1561
PORTUGAL	800 815 047
RUSSIA	Initial Dial: 8 495 363 2400 / 8 10 800 110 1011 Access Code: 866 307 5676
SLOVAKIA	0800 601 180
SOUTH AFRICA	087 195 1136
SPAIN	900 751 315
SWEDEN	010-102 04 15
SWITZERLAND	0800 121 164
TURKEY	800 4924 0880 075
UNITED ARAB EMIRATES (UAE)	800 0120166
UNITED KINGDOM	0800 066 8827

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