

BILL S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Report for the financial year ended March 31, 2025

Ricoh Canada Inc.

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*. This report outlines the approach and initiatives by Ricoh Canada Inc. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2024 and ending March 31, 2025.

Ricoh Canada Inc. (“Ricoh Canada”) is committed to ensuring that its business and supply chains respect human rights. We are committed to improving our understanding of forced labour and child labour and to implementing and improving measures to combat forced labour and child labour.

Ricoh Canada’s Structure

Ricoh Canada was established in approximately 1993. Ricoh Canada is an Ontario Corporation with a head office at 400-5560 Explorer Drive, Mississauga, Ontario, L4W 5M3. Ricoh Canada’s website can be found at www.ricoh.ca

Ricoh Canada’s ultimate parent company is Ricoh Company, Ltd. (“Ricoh”), headquartered in Tokyo, Japan. Ricoh has an 85-year history. In the financial year ended March 31, 2025, Ricoh’s global group of companies (“Ricoh Group”) had worldwide sales of 2,527 billion yen (approximately 24.10 billion CAD). Ricoh’s website can be found at www.ricoh.com

Ricoh Canada’s Activities

Ricoh Canada is the Canadian distributor of RICOH brand equipment. Ricoh Canada also services its equipment, resells RICOH branded and third-party software products, and provides professional services.

Ricoh Canada’s Supply Chains

Ricoh Canada does not perform any manufacturing of equipment.

Ricoh Canada purchases its RICOH products from Ricoh USA, Inc. (“Ricoh US”). Ricoh US, with a head office in Exton, Pennsylvania, is the North American distributor of RICOH products that have been designed, developed and produced by Ricoh Group companies in China, Japan, Thailand, the United Kingdom, France, and the United States. Ricoh’s first-tier suppliers for these products are also in these countries. The proportion of products which the Ricoh Group purchases from each of these areas are as follows:

- China 34%
- Japan 52%
- Thailand 12%
- Others 2%

On a global basis, the Ricoh Group has 1,801 supplier companies. From these suppliers, Ricoh identifies critical suppliers according to certain criteria, taking into consideration the procurement amount and volume, the importance and substitutability of procured materials and parts, as well as the risk of not being able to procure parts because of politics, regulations, labor conditions, energy consumption, potential pollution, etc. in the country concerned. As of March 2023, a global total of 216 companies have been specified by Ricoh as critical suppliers.

Non-Ricoh Developed Products and Services

Ricoh Canada's Supply Chain group also manages the suppliers of non-Ricoh developed products that are sold at a local level. Ricoh Canada obtains non-Ricoh developed products and services from different suppliers depending on the requirements of our customers and our business. Some products and services are procured on a global basis using international suppliers. Local products account for less than 1% of the total products purchased by Ricoh Canada. Almost all products purchased by Ricoh Canada are RICOH branded products or are purchased through Ricoh US.

Ricoh's Global Commitment to Supply Chain Management

Ricoh's global supply chain management approach and practices are described on Ricoh's website at the following page: [Supply Chain Management | Global | Ricoh](#)

Ricoh has a long history of maintaining responsible supply chains and promoting corporate social responsibility.

Ricoh adheres to guidelines of ISO26000 and is a proud member of the United Nations Global Compact. Ricoh has consistently been recognized through awards in the context of corporate social responsibility, for example:

- Ricoh has received Gold rating in the sustainability survey conducted by [EcoVadis](#). Since receiving the first Gold rating in 2014, Ricoh has consistently received this high rating in the survey. EcoVadis assesses corporate policies, initiatives and achievements in areas concerning the Environment, Labour Practices, Fair Business Practices, and Supply Chain.
- Ricoh has been selected for inclusion in the [MSCI Japan ESG Select Leaders Index](#) and the [MSCI Japan Empowering Women Index \(WIN\)](#).
- Ricoh continues to be recognized in the [FTSE4Good Index Series](#) and the [FTSE Blossom Japan Index](#).
- Ricoh has been awarded "Prime" status in the [ESG Corporate Rating by ISS ESG](#), an investment solutions business unit of the world's leading proxy advisory firm, Institutional Shareholder Services Inc. (ISS) of the United States.
- Ricoh has been selected as 2023 Global 100 Most Sustainable Corporations
- Ricoh has been Selected as a member of the Sustainability Yearbook 2023 by S&P Global
- "Ricoh has been awarded an "A" rating as part of the CDP's annual Supplier Engagement Rating and placed on the prestigious CDP2022 Supplier Engagement Leaderboard for the third year in a row.

Ricoh Canada's senior management is also actively involved in Ricoh's Corporate Social Responsibility practices.

Other relationships

As well as relationships with suppliers, Ricoh has established other relationships which assist it to regularly evaluate and address human rights issues as part of its worldwide commitment to fair labour practices within the Ricoh Group supply chain.

- The UN Global Compact, launched in July 2000, advocates ten principles in the fields of human rights, labour, environment, and anti-corruption. Ricoh joined the Compact in 2002 and is committed to ensuring these principles are observed in all areas and in all operations.
- Ricoh joined the Responsible Business Alliance (“RBA”) in November 2019, the world’s largest industry non-profit coalition dedicated to corporate social responsibility (“CSR”) in Global Supply Chains. The RBA sets out standards in the RBA Code of Conduct to help ensure that, in supply chains, work environments are safe, workers are treated with respect and dignity, and the manufacturing processes are responsible for their environmental impact. Ricoh complies with the RBA Code of Conduct in its business activities. Moreover, it will respect RBA’s common goals and spirit and commits to adopting and implementing the RBA approach and tools. All four sites audited in 2022 have been certified by the RBA. Two sites in Japan have acquired Gold certification.
- Ricoh is a member company of the Responsible Minerals Trade Working Group launched in May 2012 by JEITA and of the Japan Conflict-Free Sourcing Working Group.
- The Ricoh Group is committed to ensuring the highest level of working conditions for its employees irrespective of location.
- Ricoh Canada has been named to the Forbes list of Canada’s Best Employers 2024, presented by Forbes and Statista Inc., the world-leading statistics portal and industry ranking provider. The awards list was announced on January 23, 2024 and is found at following website: [Canada's Best Employers 2024 \(forbes.com\)](https://www.forbes.com/2024/01/23/canada-best-employers-2024/)

Further information about RBA VAP audits for Ricoh group production facilities can be found in the Due Diligence section of Ricoh’s Human Rights page, located here: [Human Rights | Global | Ricoh](#)

Understanding the Risks of Forced Labour or Child Labour is Used in Production

As explained above, the products imported and sold by Ricoh Canada are almost all manufactured by Ricoh Company, Ltd. through its global network. Ricoh Canada relies on the global supply chain management of its ultimate parent company, but also seeks to understand better the risks of forced labour or child labour being used in the production of goods. Members of Ricoh Canada’s senior management are engaged with Ricoh US in a North American compliance model, which is formed of several working groups, including a supply chain governance group. Ricoh Canada and Ricoh US are committed to aligning their practices in the light of Bill S-211, the Uyghur Forced Labor Prevention Act (“UFLPA”) and other similar legislation. Our ultimate goal is to understand the risks of forced labour or child labour in a comprehensive way.

Our Policies in relation to Forced Labour and Child Labour

Ricoh Canada, as well as all operations within the Ricoh Group, are committed to the fulfilment of our Environmental, Social and Governance (ESG) responsibilities. The Ricoh Group’s ESG page can be found at [Sustainability | Global | Ricoh](#). The Ricoh Group has developed and implemented policies that apply to combating forced labour and child labour on a global level to ensure consistency throughout every aspect of its operations. The Ricoh Group has done this through the Ricoh Group Code of Conduct, found here: [Ricoh Group Code of Conduct | Global | Ricoh](#). The Code of Conduct establishes the basic standards to ensure executives and employees of the company, when engaging in corporate activities to advance the Ricoh Group, shall act in accordance with social ethics and in full compliance with the law.

In addition, and as part of Ricoh’s and Ricoh Canada’s commitment to combatting forced labour and child labour, Ricoh Canada is bound to the following global Ricoh policies:

1. *Ricoh Group’s Human Rights Policy*

Ricoh has established the Ricoh Group's Human Rights Policy, found here: [Ricoh Group Human Rights Policy E](#) The policy has been established in accordance with the United Nations Guiding Principles on Business and Human Rights and with international standards such as U.N. International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

In accordance with this policy, the Ricoh Group aims to contribute to the realization of a sustainable society by continuing to conduct its management in a manner that respects human rights in its business activities around the world.

2. ISO26000

The Ricoh Group recognizes ISO26000 as a reference document that provides guidance for implementation of the ESG strategy and policies across the global organization. As such, Ricoh Canada is committed to continually integrating the ISO26000 standard into our business operations. Further information on our ESG activities in respect of human rights can be found on Ricoh's Human Rights page found here: [Human Rights | Global | Ricoh](#)

3. Procurement policy

Ricoh Canada, and the Ricoh Group globally, are committed to ensuring that there is no forced labour or child labour in our supply chains or in any part of our business. Ricoh Group companies must follow the Ricoh Group Code of Conduct when conducting purchasing activities. Our procurement policy also requires compliance with our ethical, social, security and environmental standards which are set out in our policies and our Ricoh Group Supplier and Partner Code of Conduct. Our Ricoh Group Supplier and Partner Code of Conduct is based on the Responsible Business Alliance (RBA) Code of Conduct and was comprehensively reviewed and revised in the latter part of FY2022, the latest version was published in April 2024. The Code can be found here: [Ricoh Group Supplier and Partner Code of Conduct](#)

Our relationships with suppliers are based on lawful, socially responsible, and fair practices. We expect our suppliers to obey the laws and regulations that require them to treat workers fairly and provide a safe and healthy work environment and we contract on this basis.

Our procurement activities are aligned to our ESG policies, ensuring, where possible (amongst other things), we:

- select suppliers that have a like-minded approach to ESG; and
- avoid suppliers that exploit child labour, disregard basic health and safety legislation, human rights, basic social legislation, and companies that exploit third party intellectual property rights without having obtained the owners' consent.

Some of Ricoh Group's larger suppliers may have their own internal procurement policies and/or codes of conduct, which are in line with Ricoh Group's requirements. In these situations, the relevant supplier's code of conduct will be accepted in place of Ricoh's supplier CSR self-assessments.

4. North America Code of Ethics

In addition to the global Ricoh policies referred to above, all Ricoh Canada and Ricoh USA employees are bound by the North American Code of Ethics. Principle #1 of the Code of Ethics requires all employees to be "responsible for knowing and adhering to all laws and Company policies relevant to their work responsibilities, including being aware of and abiding by laws and policies related to employment discrimination and harassment, workplace violence, drugs and alcohol, health, safety and the environment, fair competition, anti-corruption, and international trade."

Training in Relation to the risks of Forced Labour and Child Labour

All Ricoh Canada must also complete Code of Ethics training annually. The curriculum of the Code of Ethics is flexible and allows for the inclusion of materials relating to topics such as forced labour and child labour. In 2025, we integrated a human slavery module into the Code of Ethics training.

In addition, Ricoh USA, Inc. also held its annual C-TPAT (Customs-Trade Partnership Against Terrorism) training, which is mandated by Ricoh for all warehouse employees in North America, including Canada's warehouse teams. This training includes a module on human slavery issues from a Global perspective.

We continue to investigate other ways in which to provide training to increase awareness on these topics.

Whistleblowing

The North America Code of Ethics also includes a whistleblowing structure and process, with an established hotline, for employees to raise any concerns they may have in relation to compliance with our legal obligations, including in relation to forced labour and child labour, and to ensure that there is adequate protection for employees and zero tolerance for retaliation against those who may report under the Code of Ethics.

Ricoh's Due Diligence Processes

We have taken steps to identify, assess, and monitor potential areas of risk in relation to our supply chains by requiring our existing first tier suppliers of Ricoh developed products in Japan, China, Philippines, Thailand, and United States to periodically undergo CSR self-assessments. The CSR self-assessments include specific questions relating to human rights, forced labour, child labour and human trafficking. The CSR self-assessments are then used by Ricoh's procurement team in Japan to identify areas of concern that may conflict with the Ricoh Group Supplier Code of Conduct.

Based on the results of the CSR self-assessments, Ricoh classifies the risk of suppliers into four categories: high, considerable, moderate, and low risk suppliers. For suppliers that are marked as high risk, Ricoh conducts interviews and discusses ways to improve their situation. Providing feedback on the CSR self-assessment to all suppliers enables Ricoh's suppliers to identify issues and improve. Where a supplier is not compliant with an area of the Ricoh Group Supplier Code of Conduct, that section of the assessment is highlighted to Ricoh and the supplier is informed that they must take immediate action or countermeasures to address the issue. No serious violations of labour laws in our supply chain have been identified as a result of our assessments done in FY2021 and FY2022.

All new suppliers of Ricoh developed products and services must complete the CSR self-assessment questionnaire early in the procurement process. It is mandatory for all new suppliers to confirm that they have read and understood the Ricoh Group Supplier Code of Conduct and that they currently comply and will continue to comply with all of Ricoh's rigorous requirements associated with social risks.

The CSR self-assessment is crucial to Ricoh's assessment of social risk in its supply chain. As such, it is part of the first step in Ricoh's critical supplier selection process and only suppliers who have conducted the CSR self-assessment may progress to the next step in the selection process.

Assessing and Managing Risk

The Ricoh Group regularly takes steps to identify the area of its business and its supply chains that are most at risk in relation to forced labour and child labour through its total risk management system. More information on this can be found at <https://www.ricoh.com/sustainability/society/fair/index.html>.

Human rights are categorized as a major risk area and one to which the Ricoh Group pays particular attention. To manage these risks Ricoh takes the steps noted above in relation to its due diligence practice with suppliers and takes steps to ensure compliance by its employees and suppliers with the policies set out above.

Ricoh also pays particular attention to human rights issues associated with obtaining minerals from conflict-affected areas and high-risk areas. More information on the work we are doing to assess, manage and address this risk can be found here: [Supply Chain Management | Global | Ricoh](#)

Remediation of the Effects of Forced Labour and Child Labour

Due to the global nature of Ricoh's supply chain, Ricoh Canada did not implement measures, in the fiscal year ending March 31, 2025, to remediate the effects of forced labour or child labour. Ricoh Canada believes that remediation is not applicable. We are committed to continue to investigate whether remediation may be applicable in the future.

Remediation of Loss of Income

Ricoh Canada believes that vulnerable families have not experienced loss of income as a result of steps Ricoh has taken to eliminate forced labour or child labour risks.

Our Effectiveness in combating Forced Labour and Child Labour

Globally, Ricoh undertakes regular audits of its internal processes and its suppliers to ensure Ricoh identifies any issues that need addressing.

Ricoh conducts CSR audits for final product assembly, components, and raw materials. Audits are typically based on the RBA Code of Conduct. Ricoh provides feedback on the audit results for each supplier and requests corrective actions for areas needing improvements.

For example, in fiscal year 2022, a total of 476 suppliers, including 216 critical suppliers, were assessed through desktop evaluations and on-site confirmations. Among the critical suppliers, 95% were evaluated and 9 critical suppliers were identified as high-risk. For a total of 9 suppliers, corrective action plans were developed and implemented based on mutual agreement.

At a global level, Ricoh remains committed to the effective implementation of their supplier evaluation program and their continuous improvement activities.

Conclusion

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the "Act") and is made for Ricoh Canada Inc. for the financial year ending 31 March 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Marc Cotie

I have the authority to bind Ricoh Canada Inc.

Name: Marc Cotie

Title: Vice President, Legal

Date: 5/31/2025