

## 1.0 INTRODUCTION

- 1.1 Ricoh (Malaysia) Sdn. Bhd. is committed to conducting its business ethically and in compliance with all applicable laws and regulations in the country. These laws include but are not limited to the Malaysian Penal Code (revised 1977), the Malaysian Anti-Corruption Commission Act 2009 (revised 2018) and Malaysian Companies Act 2016. These laws prohibit acts of bribery and corruption, and mandate that companies establish and maintain adequate procedures to prevent bribery and corruption.
- 1.2 This Policy is applicable globally. If you are travelling outside of Malaysia, you are subject to the laws of the country you are in but the principles of this Policy must be adhered to regardless of whether or not that country has specific anti-bribery and anti-corruption laws. In cases where there is a conflict between the specific anti-bribery and anti-corruption laws and the principles contained in this Policy, the stricter provision shall prevail.
- 1.3 Under the Malaysian Anti-Corruption Commission Act 2009 (revised 2018) (MACC Act), bribery and corruption are criminal offences and the legal consequences include a fine of up to 10 times the amount of the Gratification subject to a minimum of RM1 million and/or imprisonment of up to twenty (20) years. A commercial organization commits an offence if an associated person corruptly gives any gratification with intent to obtain or retain business or an advantage in the conduct of business, for the commercial organization.
- 1.4 “Gratification” means:
- (a) money, donation, gifts, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
  - (b) any dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
  - (c) any payment, release, discharge or liquidation of any loan, obligation or other liability;
  - (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
  - (e) any forbearance to demand any money or money’s worth or valuable thing;
  - (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature; and

(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

1.5 If an offence is committed by a commercial organization, the MACC Act also deems its directors, controllers, officers, partners or persons concerned in its management of affairs to have committed the same offence. It is therefore important that you understand how bribery and corruption may be committed and the legal consequences arising from such act as well as to take steps to prevent bribery and corruption from happening.

## 2.0 SCOPE

2.1 This Policy is applicable to the Employees at all levels of Ricoh (Malaysia) Sdn. Bhd. All Employees are required to read, understand and comply with this Policy during the course of their work. This Policy is also applicable to Business Associates who are required to comply with the relevant provisions of this Policy in their dealings with Ricoh (Malaysia) Sdn. Bhd. and its Employees.

2.2 Employees refers to anyone who is employed by or works at Ricoh (Malaysia) Sdn. Bhd. whether permanent, fixed-term or temporary basis, interns and directors (executive and non-executive). Business Associates refers to anyone whom performs services for and on behalf of Ricoh (Malaysia) Sdn Bhd. It is also applicable to contractors, sub-contractors, consultants, agents, representatives, vendors, suppliers and service providers of any kind performing work and services, for or on behalf of Ricoh (Malaysia) Sdn. Bhd. (together, "Business Associates").

2.3 Responsibilities of Employees:

- Read, understand and comply with the Policy
- Attend Anti-Bribery and Corruption Training
- Raise questions and voice concerns if the Employee is aware of any suspected violations of laws and internal policies.

2.4 Responsibilities of Business Associates:

- Business Associates who work for and on behalf of the Company are expected to act in a way that is consistent with this Policy.
- Prior to the appointment by Ricoh (Malaysia) Sdn. Bhd., Business Associates must acknowledge and agree to read, understand and comply with this Policy.

### 3.0 ANTI-BRIBERY AND ANTI-CORRUPTION

- 3.1 The Malaysian Anti-Corruption Commission describes “corruption” as an act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job function or activity.
- 3.2 The MACC Act stipulates four (4) main offences, being:
- Soliciting / Receiving Gratification (Bribe) - Sections 16 & 17(a) MACC Act
  - Offering / Giving Gratification (Bribe) - Section 17(b) MACC Act
  - Intending to Deceive (False Claim) - Section 18 MACC Act
  - Using Office or Position for Gratification (Bribe) (Abuse of Power / Position) - Section 23 MACC Act
- 3.3 The MACC Act which has been in force on 1 June 2020 introduces two (2) more offences, being:
- Offering / Giving Gratification by commercial organization (Corporate Liability) – Section 17A MACC Act
  - Deemed Parallel Personal Liability for Senior Employees (Personal Liability) – Section 17A(3) MACC Act
- 3.4 Corruption may include “bribery” which is any offering, promising, giving, requesting agreeing to receive, accepting a gratification, or other advantages with the intention of inducing or rewarding someone to perform their job function or activity improperly. Form of bribery includes kickbacks, inflated commissions, expensive gifts, political donations, excessive or inappropriate entertainment.
- 3.5 This Policy prohibits all forms of bribery and corrupt practices, and makes no distinction between whether they are being made to persons in the public or private sectors. Employees and Business Associates must not directly or indirectly pay, offer or promise any gratification to any public official, party or their family members as an inducement for or reward for acting improperly. Furthermore, Employees must not directly or indirectly pay, offer or promise gratification to customers, Business Associates or any other party for the purpose of exerting influence, soliciting payment or other unfair or illegal preferential treatment.

#### 4.0 FACILITATION PAYMENTS

- 4.1 Facilitation payments are forms of payments made personally to an individual in control of a process or decision to secure or expedite the performance of a routine or administrative duty or function (e.g. influencing the timing of process or issuing of permits). In Malaysia, facilitation payments are illegal. It is seen as a form of corruption and is strictly prohibited under this Policy.
- 4.2 Employees and Business Associates must not directly or indirectly offer, promise or give any form of facilitation payment to any private, government-linked and public officials for any purposes.

#### 5.0 GIFTS, ENTERTAINMENT AND HOSPITALITY

##### 5.1 Gifts

###### A. Providing Gifts

- (a) “Corporate gifts” normally bear the company’s name and logo and are of nominal/ appropriate value such as diaries, table calendars, pens, notepads and plaques. “Festive or Ceremonial gifts” are traditional treats or gifts customary to the occasion such as hampers, mandarin oranges, dates, mooncakes etc.
- (b) Corporate gifts, Festive or Ceremonial gifts may be given to our customers, Business Partners or other parties provided it fulfills all of the following conditions:
- (i) made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with festive seasons or other ceremonial occasions;
- (ii) no obligation – it must not be used to cause or induce the receiver to improperly or illegally influence any business action or inaction or cause others to perceive an improper influence;
- (iii) no expectation – there must not be any expectation of any favour or improper advantages from the receiver;
- (iv) made openly – if made secretly and undocumented then the purpose will be open to question;
- (v) reasonable value – the type of gifts and its value must commensurate with the occasion and in accordance with general business practice. The value limit for “Corporate Gift” is RM50.00 and below (all inclusive) per item per person. The value limit for Festive and Ceremonial gift is RM500.00 and below (all inclusive) per item per entity.
- (vi) legal – it complies with applicable laws; and

- (vii) documented – gift that is above value limit is required to complete and submit relevant form to the Head of Department and Managing Director for approval. Form attached as Appendix 1.
- (c) Malaysia anti-bribery and anti-corruption laws impose strict restrictions on the value and level of gifts to be accorded to public officials. Ricoh (Malaysia) Sdn. Bhd. is committed to complying with all applicable laws and Employees must not offer or promise to give any gifts to public officials or foreign public officials.

#### B. Accepting Gifts

- (a) Ricoh (Malaysia) Sdn. Bhd. recognizes that exchanges of are a very delicate matter where, in certain cultures or situations, gifts giving is customary, a tradition or central part of business etiquette.
- (b) Employees and Business Associates are expected to always communicate our policies on anti-bribery and anti-corruption to external parties and to decline (or avoid accepting) gifts with the exceptions being:
  - (i) corporate gifts of nominal/appropriate value;
  - (ii) gifts given during invitations to speak at conferences or work-related conferences. If you are in doubt about the acceptability, the gifts must be refused.
- (c) Employees and Business Associates must not directly or indirectly solicit for gifts from any party for themselves, family or for or on behalf of Ricoh (Malaysia) Sdn. Bhd.
- (d) Employees must inform Human Resource Division and record any gifts received, irrespective of value using form attached as Appendix 2 within five (5) working days of receipt. Employees (or anyone on their behalf) must not accept gifts in the form of cash or cash equivalent from any party having business dealings with Ricoh (Malaysia) Sdn. Bhd.

## 5.2 Entertainment

### A. Providing Entertainment

- (a) It is a common practice within the business environment to provide entertainment to foster business relationships. Ricoh (Malaysia) Sdn. Bhd. recognizes the need to provide reasonable and proportionate entertainment under appropriate circumstances. Employees may offer appropriate and proportionate entertainment value limit to RM100.00 and below (all inclusive) per person per occasion and subject to the overall limit of their Level of Authority Limit or Division Limit that is legal and reasonable within the scope of their work as part of business networking as well as a measure of goodwill towards the recipients.

- (b) Entertainment that is above value limit is required to complete and submit relevant form to the Head of Department and Managing Director for approval. Form attached as Appendix 1.
- (c) Whilst the act of hospitality through entertainment is a central part of business etiquette, it may create a negative perception if observed or known by others despite selfless motives behind the entertainment provided. Employees and Business Associates must always bear in mind that perception is more important than facts and therefore Employees are expected to always exercise proper care and good judgement when providing entertainment to external parties.
- (d) Employees and Business Associates must not directly or indirectly provide or offer to provide entertainment with a view to cause undue influence or in exchange for favours or advantages. Such acts are considered corruption.
- (e) Malaysia anti-bribery and anti-corruption laws impose strict restrictions on the value and level of entertainment to be accorded to public officials. Ricoh (Malaysia) Sdn. Bhd. is committed to complying with all applicable laws and Employees and Business Associates must not offer, promise to give any entertainment to public officials or foreign officials.

#### B. Accepting Entertainment

- (a) Ricoh (Malaysia) Sdn. Bhd. recognizes that occasional acceptance of appropriate and proportionate entertainment provided by Business Associates or other parties in the normal course of business is a legitimate way to network and to build business relationships.
- (b) However, it is important for Employees to always communicate our policies on anti-bribery and anti-corruption to external parties exercise proper care and good judgement before accepting entertainment offered or provided by customers, Business Partners or other external parties. This is to safeguard Ricoh (Malaysia) Sdn. Bhd.'s reputation and avoid allegations of impropriety or undue influence or worse, corruption.
- (c) Employees must at all times conduct themselves with integrity in relation to accepting entertainment from any party. Employees or any of their family members must not accept entertainment in exchange for an exercise or non-exercise of their job function or activity.

#### 5.3 Corporate Hospitality

Corporate hospitality is generally corporate events or activities organized by an organization, which involves entertainment of Employees and/or other parties for the benefit of that organization. Examples of corporate hospitality includes seminars/workshop/talks on subject matters relevant to the specific

products/solutions/business/industry. Other parties may include customers, contractors, consultants, bankers, lawyers, suppliers, vendors, service providers of any kind, stakeholders with whom a business relationship (whether past, present or prospective) exists and the public at large.

#### A. Providing Corporate Hospitality

- (a) Ricoh (Malaysia) Sdn. Bhd. recognizes that providing corporate hospitality be it through corporate events, sport events or other public events, is a legitimate way to network, promote goodwill and build business relationships.
- (b) While providing appropriate and proportionate corporate hospitality is a reflection of Ricoh (Malaysia) Sdn. Bhd.'s courtesy and generosity, Employees and Business Associates must exercise proper care and good judgement to ensure that the arrangement is legal under applicable laws, made for the right reasons and reasonable in its form and limit. More importantly, it must not be given or give rise to the perception that it is given to obtain business or advantage of any kind or unduly influence the outcome of a business decision.
- (c) Malaysia anti-bribery and anti-corruption laws impose strict restrictions on the value and level of corporate hospitality to be accorded to public officials. Ricoh (Malaysia) Sdn. Bhd. is committed to complying with all applicable laws and Employees and Business Associates must exercise special caution when providing corporate hospitality and must at all times communicate our policies on anti-corruption to external parties.

#### B. Accepting Corporate Hospitality

- (a) As a general principle, Employees and Business Associates must not directly or indirectly solicit corporate hospitality or accept corporate hospitality of any form that is excessive, inappropriate, illegal or given in response to, in anticipation of, or to influence a favourable business decision.
- (b) Notwithstanding the above, Ricoh (Malaysia) Sdn. Bhd. recognizes that occasional acceptance of an appropriate level of corporate hospitality given in the normal course of business is usually a legitimate contribution to building good business relationships. However, Employees and Business Associates must always communicate our policies on anti-corruption to external parties exercise proper care and good judgement to ensure that the arrangement is legal under applicable laws, made for the right reasons and reasonable in its form and limit. More importantly, it must not be accepted or give rise to the perception that it is accepted to obtain business or advantage of any kind or unduly influence the outcome of a business decision.

## 6.0 DONATION AND SPONSORSHIP

- 6.1 Prohibition of donation/contribution to political parties or individual politicians. Employees and Business Associates must not make donation or funding of any kind to political parties or individual politicians or towards political campaigns or initiatives for or on behalf of Ricoh (Malaysia) Sdn. Bhd.
- 6.2 Charitable or Educational Donations and Sponsorships  
Ricoh (Malaysia) Sdn. Bhd. will only provide charitable or educational donations and public welfare sponsorships if they are ethical and legal under applicable laws. All donation and sponsorship expenses must be approved in accordance with Ricoh (Malaysia) Sdn. Bhd.'s standard operating procedures.
- 6.3 Employees and Business Associates must never use donations or sponsorships to obtain business or advantage of any kind or unduly influence the outcome of a business decision or cause others to perceive it as such. The use of donations or sponsorships in this manner is strictly prohibited under this Policy.
- 6.4 Employees are required to complete and submit relevant form to the Head of Department and Managing Director for approval. Form attached as Appendix 1.

## 7.0 CONFLICTS OF INTEREST

- 7.1 Conflicts of interest arise where there is personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgement for or on behalf of Ricoh (Malaysia) Sdn. Bhd. Employees and Business Associates must avoid situations in which their personal interest would conflict with their duties and responsibilities. Employees must not use their position, official working hours, Ricoh (Malaysia) Sdn. Bhd.'s resources and assets, or information available to them for personal gain or to Ricoh (Malaysia) Sdn. Bhd.'s disadvantage.
- 7.2 In situations where conflict of interest arises, Employees are required to immediately declare the matter to their immediate supervisor.



## 8.0 DUE DILIGENCE

8.1 Due diligence will be taken in vetting all associated persons described in Paragraph 2.0 as well as all parties entering into formalised relationships with Ricoh (Malaysia) Sdn Bhd, including background checks on the person or entity, document verification processes and face to face interview with persons appointed to a key role where corruption risk has been identified.

## 9.0 WHISTLEBLOWING HOTLINE

9.1 If Employees suspect, or reasonably believe that this Policy has been, or is being breached, you have an obligation to report your concerns using the reporting channels under the Whistleblowing Hotline as per policy:

(a) Phone (Malaysia) : 1-800-81-7270

(b) Online (Ricoh Asia Pacific) :

<https://secure.ethicspoint.eu/domain/media/en/gui/105962/index.html>

(c) Email (Ricoh Asia Pacific) : WB\_Admin@rapp.ricoh.com

(d) Online (Ricoh Global) : [zjp\\_rg\\_global\\_wb@jp.ricoh.com](mailto:zjp_rg_global_wb@jp.ricoh.com)

9.2 All concerns reported will be taken seriously, treated in confidential manner and investigated immediately. Employees anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation, but Employees may be required to provide a statement as supporting evidence to any investigation. Any retaliation directed against anyone making such report will not be tolerated.

9.3 If you have any queries or concerns about whether an act might constitute bribery or corruption, please contact the Local Integrity Committees below:

(a) Managing Director (Chairperson)

(b) General Manager, Finance & Admin

(c) General Manager, Human Resource & TQM

(d) Manager, TQM & Sales Training

## 10.0 ANTI-BRIBERY AND ANTI-CORRUPTION COMPLIANCE FUNCTION

10.1 Ricoh (Malaysia) Sdn. Bhd. has established and will continue to maintain the Local Integrity Committee to be responsible for all anti-bribery and anti-corruption compliance matters.

- 10.2 The Local Integrity Committee is adequately equipped to act effectively against bribery and corruption in the following manner:
- (a) provide advice and guidance on anti-bribery and anti-corruption compliance program and issues relating to bribery and corruption;
  - (b) take appropriate steps to ensure that there is adequate monitoring, measurement, analysis and evaluation of the anti-bribery and anti-corruption compliance program; and
  - (c) report on the performance of the anti-bribery and anti-corruption compliance program to Regional Integrity Committee regularly.
- 10.3 Appropriate resources shall be provided for effective operation of the anti-bribery and anti-corruption compliance program and that the Local Integrity Committee is staffed with persons who have the appropriate competence, status, authority and independence.
- 10.4 The lines of authority for the Local Integrity Committee tasked with responsibility for overseeing the anti-bribery and anti-corruption compliance program including Risk Assessment shall be as appropriate to enable complaints to be made without regard to the hierarchy of employment.
- 11.0 REGULAR MONITORING AND REVIEW
- 11.1 Ricoh (Malaysia) Sdn. Bhd. is committed to making the anti-bribery and anti-corruption effort as a continuous effort to maintain good corporate governance, reputation and standards of Ricoh (Malaysia) Sdn. Bhd.
- 11.2 Employees are encouraged to raise any concerns or inadequacies in the anti-bribery and anti-corruption compliance program to the Local Integrity Committee.
- 11.3 A comprehensive risk assessment shall be done every 3 years, with intermittent assessments conducted when necessary focusing on the following areas;
- (a) opportunities for corruption resulting from weaknesses in internal governance;
  - (b) disguised financial transactions that may conceal corrupt activities
  - (c) relationships with third party vendors and suppliers
- 11.4 Regular audits shall be conducted to monitor, review, improve and assess performance, efficiency and effectiveness of ongoing anti-bribery and anti-corruption efforts by Ricoh (Malaysia) Sdn. Bhd. Such audits may be conducted internally by Ricoh (Malaysia) Sdn.

Bhd. or by an external party. The results of any audit, risk assessment, review of control measures and performance shall be reported to the Local Integrity Committee and Board of Directors and shall be acted upon accordingly.

## 12.0 RECORD KEEPING

12.1 Ricoh (Malaysia) Sdn. Bhd. will keep detailed and accurate financial records and will have internal controls in place to act as evidence for all payments made in the course of its business and daily operations.

12.2 Ricoh (Malaysia) Sdn. Bhd. will declare and keep a written record of the amount and reason for corporate hospitality, entertainment or gifts accepted and given.

## 13.0 TRAINING AND COMMUNICATIONS

13.1 This Policy is a public document which shall be communicated to all Employees. Employees must read and understand Ricoh (Malaysia) Sdn. Bhd.'s position on anti-bribery and anti-corruption.

13.2 Adequate training on Ricoh (Malaysia) Sdn. Bhd.'s anti-bribery and anti-corruption approach shall be provided to Employees.

## 14.0 ENFORCEMENT FOR NON-COMPLIANCE

14.1 Ricoh (Malaysia) Sdn. Bhd. regard acts of bribery and corruption seriously and will take appropriate actions in the event of non-compliance of this Policy. All employees and business associates must ensure that he/she read, understand and comply with the information contained within this Policy.

14.2 The Management could be held liable for failing to prevent bribery if a person associated with it commits an offence under the Act. All employees are equally responsible for the prevention, detection and reporting of bribery and other form of corruptions. They are required to avoid any activities that could lead to, or imply, a breach of this Anti-bribery and Anti-Corruption Policy.

- 14.3 If any Employees breach this policy, he/she shall face disciplinary action and could face dismissal for gross misconduct.
- 14.4 Ricoh (Malaysia) Sdn. Bhd. shall reserve the rights to take appropriate legal proceedings against the Employees who has violated this Policy.
- 14.5 Resigned Employees and Business Associates are subject to appropriate legal proceedings exercise by Ricoh (Malaysia) Sdn. Bhd. for any non-compliance and violation to this Policy.

15.0 GENERAL ENQUIRIES

- 15.1 In the event of any queries, you may contact Ricoh (Malaysia) Sdn. Bhd.'s Local Integrity Committee at email address : Ricoh.Malaysia.Hotline@ricoh.com.my.

16.0 REVISIONS

- 16.1 This Policy will be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements.

**APPENDIX 1**

**PRE-APPROVAL FOR PROVISION OF  
GIFTS/ENTERTAINMENT/HOSPITALITY/DONATIONS/SPONSORSHIPS**

If you intend to provide gifts(s), entertainment or hospitality to customers or Business Associates or any third party connected to Ricoh (Malaysia) Sdn. Bhd. that is not planned and noted in the event calendar, you are required to seek prior approval of the Head of Department and Managing Director by completing this form.

Name:

Position:

Department:

Gifts/Entertainment/Hospitality/Donations/Sponsorships to be provided:

Reasons for the Gifts/Entertainment/Hospitality/Donations/Sponsorships:

Signed By:

Name:

Date:

*This completed form should be sent to the Head of Department and Managing Director for approval. A signed copy will be returned to you.*

Approved/Rejected By:

Approved/Rejected By:

Head of Department

Managing Director

Name:

Name:

Date:

Date:

**APPENDIX 2**

**RECORD OF GIFTS/ENTERTAINMENT/HOSPITALITY/DONATIONS/SPONSORSHIPS RECEIVED BY AN EMPLOYEE**

You should complete this form if you have received a gift/entertainment/hospitality/donation/sponsorship in connection with your duties and responsibilities is of any value.

The completed form should be returned to Human Resource Department within 5 working days of receipt.

Name:  
Position:  
Department:

Gift/Entertainment/Hospitality/Donation/Sponsorship received:

Value/anticipated value:

Reasons for the Gifts/Entertainment/Hospitality/Donations/Sponsorships:

Signed By:  
Name:  
Date:

This completed form should be sent to the Head of Department and Managing Director for approval. A signed copy will be returned to you.

Approved/Rejected By:

Approved/Rejected By:

Head of Department  
Name:  
Date:

Managing Director  
Name:  
Date: