

SEXUAL HARASSMENT AND HARASSMENT POLICY

Ricoh Logistics Corporation

Document Control #: HR-032	Revision: 5 Revised Date: 1/11/2018
Effective Date: 1/1/2005	Expiration Date: none
Originator: Human Resources Administrator	Approval: Yusuke Ito Title: Director, Human Resources

Standard Element:

ISO 27001:2013: N/A

1. PURPOSE

Ricoh Logistics Corporation (RLC) is committed to providing employees with a working environment free of discrimination, harassment, and sexual harassment. RLC expects that all employee work relationships will be professional and free of any discrimination, harassment or sexual harassment.

2. SCOPE

This policy applies to all employees of Ricoh Logistics. The Company prohibits harassment in employment on the basis of sex, race, color, religion, age, national origin, disability, sexual harassment or harassment on the basis of any other protected characteristics, such as race, color, religion, sex, age, national origin, disability, status as a protected veteran including disabled veteran, recently separated veteran, active duty wartime or campaign badge veteran or armed forces services medal veteran, marital status, sexual orientation or any other factor prohibited by law. Inappropriate behavior and harassment is prohibited, both in the workplace and off the premises, including at social activities conducted or sponsored by the Company.

All Ricoh Logistics employees must comply with this policy. Violations of the policy will result in disciplinary action. The Company also will not permit any harassment of a Company employee by any personnel of a customer, vendor or other business entity who has a relationship to the employee through the business of the Company. Likewise, employees are prohibited from harassing any personnel of a customer, vendor, or other business entity who has a relationship to the employee through the business of the Company. Ricoh Logistics expects that all employee work relationships, including co-workers, managers, contractors, consultants, customers and vendors, will be professional and free of any discrimination, harassment or sexual harassment.

3. RESPONSIBILITY FOR COMPLIANCE

- o All managers and supervisors are responsible for ensuring that employees are aware of and adhere to this policy.

- o Employees accept and fulfill responsibilities.
- o Human Resources has the overall responsibility for administering the policy and ensuring that all managers and supervisors are in compliance. Human Resources is also responsible for investigating and resolving any complaints of harassment or sexual harassment made by employees.

4. DEFINITIONS

Sexual harassment in the workplace is a form of gender discrimination that is unlawful and a violation of Title VII of the Civil Rights Act of 1964. The workplace includes the work environment, as well as off-premises activities, such as business trips, meals, entertainment, and company-sponsored social or recreational events where the activities are an extension of the work environment.

Sexual harassment is defined in federal regulations as “unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature” when:

- Submission to each conduct is made either explicitly or implicitly a term or condition of an individual’s employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual ;or
- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

Harassment other than sexual harassment, is verbal or physical conduct that denigrates or shows hostility or aversion to an employee because of gender, race, color, religion, age, national origin, disability, veteran’s status, marital status, sexual orientation or any basis prohibited by law when the conduct:

- Has the purpose or effect of unreasonably interfering with an employee’s work performance;
- Create an intimidating, hostile, or offensive work environment; or
- Otherwise adversely affects an individual’s employment opportunities.

Harassment (both sexual and non-sexual) may include, but is not limited to:

- Verbal abuse, ridicule, including slurs, epithets, and stereotyping, offensive jokes and comments;
- Threatening, intimidating or hostile acts; and
- Displaying or distributing offensive materials, writings, graffiti, or pictures.

When submission to or rejection of sexual advances or favors are made explicitly or implicitly a term or condition of employment, it is referred to as “**Quid Pro Quo**” harassment, or it is a term that means literally “this for that.” Some examples are promises from a manager or supervisor for a promotion, better work assignments, salary increases, or continued employment if the employee agrees to unwelcome sexual advances. Conversely, adverse employment decisions that may occur if an

employee refuses to agree to the unwelcome sexual advances can also be “Quid Pro Quo” sexual harassment.

5. GUIDELINES

All reports of harassment will be investigated, and any appropriate corrective action will be taken in accordance with Company policy. Complaints will be handled confidentially, except as necessary for investigation and resolution. This policy prohibits retaliation, harassment, or other adverse action because of making a good faith complaint, assisting in an investigation, opposing harassment or otherwise exercising rights protected by law. Employees are encouraged to contact local Human Resources with any questions about this policy or its application, or about harassment of any form.

Any individual who deliberately provides false information regarding a complaint or the investigation of a complaint will be subject to disciplinary action up to and including termination of employment.

Retaliation against an individual for filing a complaint of sexual harassment or harassment, or for participating in an investigation of a complaint, is a serious violation of this policy and is against the law. Acts of retaliation are strictly prohibited and should be reported immediately to local Human Resources. All charges of retaliation will be promptly investigated and addressed.

Company-sponsored events that would intentionally or unintentionally exclude employees or groups of employees based on gender, race, national origin, religion, sexual orientation, age, disability, or other protected status, are absolutely prohibited. An example of such prohibited activity would include attending adult-entertainment clubs while on company business with customers or co-workers. Such conduct is not permitted by the Company.

Managers are absolutely prohibited from participating in an/or requiring, pressuring, encouraging, condoning, or permitting employees to engage in business-related activities (on or off Company premises) that could either constitute harassment, including but not limited to sexual harassment, or that could otherwise offend or discriminate against employees or groups of employees based on gender, race, national origin, religion, sexual orientation, age, disability, or other protected status.

Ricoh Logistics has zero tolerance for any violation of these, or any other company policies. Violating these policies destroys morale and fails to uphold our value of building trust and respect for all individuals, and erodes the trust and confidence we place in our leaders.

Dissemination of Policy

It is the company's intention that all employees of Ricoh Logistics have a clear understanding of what behaviors are considered unacceptable in the workplace as

well as the company's procedure for reporting concerns or problems regarding sexual harassment and harassment. The Company has therefore established a series of activities to ensure full communications in this matter:

- o Employees are made aware of the Company's Sexual Harassment and Harassment Policy upon hire;
- o The policy is posted at all locations
- o Sexual Harassment awareness training is conducted periodically for all managers and supervisors.
- o Sexual Harassment awareness training is conducted periodically for all employees

Complaint Process

Employees should immediately notify their immediate manager, any member of management at the location with whom the employees feel comfortable discussing the situation or Human Resources if he/she believes prohibited harassment has occurred, or if he/she has questions concerning this policy.

Any supervisor or manager who has been informed about or otherwise becomes aware of an alleged incident of sexual harassment or other harassment must contact Human Resources so immediate action can be taken. Any member of management who receives a report of discrimination or harassment shall inform the concerned employee that management will contact Human Resources, which will coordinate a prompt investigation of the complaint.

6. SAFETY & ENVIRONMENTAL INFORMATION

None

7. ASSOCIATED DOCUMENTS

H.R. Incident Reporting (HRform32-1)

H.R. Statement of Incident (HRform32-2)

Employee Reprimand (HRform32-3)

Employment of Relatives (HR-011)

Consensual Relationship Agreement (HRform011)

Equal Employment Opportunity HR045

8. DOCUMENT REVISION HISTORY

DATE	REVISION	CHANGES MADE
4/1/2008	Rev1	California AB1825 training compliance
10/25/2011	Rev2	ISO27001:2005 compliance
12/14/2015	Rev3	ISO27001:2013 compliance
4/1/2016	Rev4	New California Regulations
1/11/2018	Rev5	New approver: Yusuke Ito

Employee Acknowledgement

Employee Name (please print): _____

Employee Signature

Date