

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun	
Page 1 of 14	Date: January 1, 2008	Title: Environmental Management Representative	

Document Certification

We hereby certify that this Environmental Policy Manual (EMS-010), dated July 27, 2001 (latest update Rev. 5, January 1, 2008) accurately and adequately describes the Ricoh Canada Environmental Management System and Policy relating to the environment. The following Ricoh Canada locations are included in the scope of this document:

326 Superior Blvd.
Mississauga, Ontario
L5T 2N7

300-5520 Explorer Drive
Mississauga, Ontario
L4W 5L1

Glenn Laverty
President & Chief Executive Officer
Ricoh Canada Inc.

Kevin Braun
EMR & Director, People & Excellence
Ricoh Canada Inc.

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E.M. & National Manager, ISO Programs
Ricoh Canada Inc.

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 2 of 14	Date: January 1, 2008	Title: Environmental Management Representative

Table of Contents

	Page No.
Document Certification	1
Table of Contents	2
Ricoh Canada Environmental Policy Manual	
4.1 General Requirements	3
4.2 Environmental Policy	3
4.3 Planning	
4.3.1 Environmental Aspects	4
4.3.2 Legal and Other Requirements	4
4.3.3 Objectives and Targets & Programs	4
4.4 Implementation and Operation	
4.4.1 Resources, Roles, Responsibility and Authority	5
4.4.2 Training, Awareness and Competence	7
4.4.3 Communication	7
4.4.4 Documentation	8
4.4.5 Control of Documents	9
4.4.6 Operational Control	9
4.4.7 Emergency Preparedness and Response	9
4.5 Checking and Corrective Action	
4.5.1 Monitoring and Measurement	9
4.5.2 Evaluation of Compliance	10
4.5.3 Non-conformance and Corrective and Preventive Action	10
4.5.4 Control of Records	10
4.5.5 Environmental Management System Internal Audit	10
4.6 Management Review	11
Appendix One	12
Approvals	13
EMS Policy Manual Revision and Approval Record	14

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun	
Page 3 of 14	Date: January 1, 2008	Title: Environmental Management Representative	

4.0 Ricoh Canada Environmental Policy Manual

4.1 General Requirements

This manual summarizes the core elements of the Ricoh Environmental Management System (EMS) and identifies relevant Standard Practices. The EMS is documented by this Manual, the Environmental Policy, procedures and work instructions.

4.2 Environmental Policy

4.2.1 Ricoh has adopted the following environmental policy:

**RICOH CANADA INC.
ENVIRONMENTAL POLICY STATEMENT**

Ricoh sells, leases, warehouses, distributes, services, and re-manufactures photocopy equipment, facsimiles, printers and scanners, while operating in a manner that will fulfill its responsibility as a leading corporate citizen in the communities in which it operates.

The President & CEO and the Senior Management Team and employees are committed to an effective environmental management system, (based on the ISO 14001 Standard) that will help Ricoh accomplish its strategic business objectives. To that end, Ricoh shall:

- Commit to the prevention of pollution, the reduction of waste, the reduction of consumable resources, and promotion of recovery and recycling;
- Commit to comply with applicable federal, provincial and local environmental laws and other environmental requirements to which the organization subscribes, and which relate to its environmental aspects;
- Strive to continually improve the environmental management system through the setting and review of environmental objectives and targets;
- Communicate all pertinent environmental issues to all Ricoh employees and to all persons performing tasks on behalf of the organization;
- Make its environmental programs an integral part of current and changing business strategies.

Implementing and communicating this policy and making it available to the public in response to requests and inquiries is a primary management objective.

4.2.2 This policy, signed and dated October 1, 2005 is posted throughout the Ricoh facility at 326 Superior Blvd., Mississauga, Ontario and at 300-5520 Explorer Dr., Mississauga, Ontario.

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun	
Page 4 of 14	Date: January 1, 2008	Title: Environmental Management Representative	

The policy will be communicated to all Ricoh employees at each facility. The policy is available to the public by contacting the Environmental Manager at Ricoh Head Office in Mississauga and requesting a copy.

4.3 Planning

4.3.1 Environmental Aspects

Ricoh determines the significant environmental aspects of its activities, products and services as per the level 2 procedure EMS-011: Aspects Identification and Evaluation that identifies and evaluates significant environmental aspects over which Ricoh has control or influence, taking into account planned or new developments, or new or modified activities, products and services. This information is kept up to date.

4.3.2 Legal and Other Requirements

The EMR is accountable for ensuring that appropriate personnel have access to and awareness of all applicable environmental laws and regulations. This includes employing personnel or retaining outside assistance from persons who have training and experience in environmental laws and regulations appropriate to the scale and complexity of each facility. The V.P. General Counsel or designate will determine how Legal & Other requirements apply to Ricoh's identified Environmental Aspects.

Ricoh's Procedure EMS-012, Legal and Other Requirements, also identifies any other facility obligation, such as corporate requirements, voluntary programs, or industry standards that each facility has committed to follow.

If Ricoh is subject to a potential or actual enforcement action it will promptly notify appropriate divisional environmental managers and the Vice President, General Counsel.

4.3.3 Objectives, Targets & Programs (EMP)

Objectives, targets and programs are established and documented, as per procedure EMS-013, at each relevant function and level to accomplish the environmental policy, and are considered when setting goals for the management of the significant environmental aspects. The views of interested parties, technological options, financial, operational and business requirements may also be considered when setting objectives and targets.

Compliance with applicable law is a fundamental policy commitment, objective and target of Ricoh. Objectives and targets to prevent pollution and continually improve the EMS may also be set. Where corporate or divisional requirements are set, Ricoh may set objectives and targets to ensure that these broader goals will be met.

The Quality and Environmental Steering Committee may determine objectives, targets and programs based on the identified significant aspects or they may be determined at the corporate level. Senior management members of the Steering

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun	
Page 5 of 14	Date: January 1, 2008	Title: Environmental Management Representative	

Committee shall review the objectives and targets with the President & CEO through the senior staff management review process.

Ricoh uses its normal business planning process to set and fund environmental objectives and targets. The Environmental Management Representative is responsible for providing or obtaining adequate resources (including funding, personnel and technical resources) and authorizations for objectives and targets. The EMR is accountable for seeing that the objectives and targets are ultimately met.

When an objective, target or program is not being met or may not be achievable in the given timeframe, this will be documented and a new objective, target or program may be implemented after documented consultation between the EMS Steering Committee and the management team.

Environmental Management Programs are used to document the methods employed for ensuring that objectives and targets are achieved and that there is a commitment to continuous improvement. Integrating existing corporate, divisional, or environmental programs into the EMS and maintaining them is an important goal of Ricoh.

Ricoh may have existing programs at each facility that are integrated into the Environmental Management Programs. Responsibility for implementing the EMP is established and documented at appropriate levels. The EMP will also establish and document the steps to be taken and the time frame for achieving the objectives and targets.

Ricoh uses or revises relevant procedures or parts of its EMS, including significant environmental aspects, objectives and targets and implementation programs when necessary to address change (such as facility expansion, modified processes, the introduction of new products or equipment at a facility, or decisions to increase production levels) or new information (such as the results of audits, management reviews or changes in legal requirements).

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility & Authority

The existing ISO 9001:2000 procedure, Management Review: QMS100 and the EMS Organizational Structure chart (Reference Documents Section 7), address the responsibilities of individuals within the Environmental Management System.

These and other roles and responsibilities shall be communicated to all Ricoh personnel, as set forth in the individual procedures or work instructions.

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 6 of 14	Date: January 1, 2008	Title: Environmental Management Representative

President & CEO

The President & CEO is ultimately responsible for the implementation and overall performance of the Ricoh Environmental Management System (EMS). He, or his designate establishes the Ricoh Environmental Policy, reviews the objectives and targets, periodically reviews the performance of the EMS through the senior management environmental review process and provides sufficient resources (human, financial, technical and specialized skills) to effectively manage and operate the facilities within the environmental policy framework.

The President & CEO has appointed an Environmental Management Representative (EMR) who is responsible for the implementation and ongoing operation of the Environmental Management System.

Environmental Management Representative (EMR)

The EMR reports directly to the President & CEO. The EMR assists the Environmental Manager with document format, systems controls, training and any other areas to implement the EMS and integrate it with the current ISO 9001:2000 system wherever possible.

The EMR is responsible for assigning objectives and targets to the applicable departments/process owners and for providing adequate resources, including appropriate budgets and manpower at the department level, to ensure that business planning needs are met.

The EMR reports the performance of the EMS, including recommendations for improvement, to the senior management team as part of the regular management review process for review and as a basis for improvement of the EMS.

Environmental Manager

The Environmental Manager has responsibility to establish operational controls, to include documented work procedures, to provide appropriate training and to maintain equipment operation and efficiency in order to accomplish the assigned objectives and targets at the facilities.

The EM is responsible for ensuring that the EMS requirements are established, implemented and maintained in accordance with the ISO 14001:2004 standard

The EM appoints appropriate staff to a permanent Quality and Environmental Steering Committee. This committee will include representatives of all departments at the facility, and others as may be designated.

The Environmental Manager shall monitor and measure progress towards achieving the environmental objectives and targets.

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 7 of 14	Date: January 1, 2008	Title: Environmental Management Representative

Employees at each Facility

The employees at each facility have the responsibility to support the Ricoh Environmental Management System as per the established environmental procedures and work instructions and adhere to the environmental policy and all applicable legal and other requirements.

Employees have the responsibility to report any environmental non-conformances to their managers.

4.4.2 Training, Awareness and Competence

The existing ISO 9001:2000 procedure, Training Requirements: QMS360, addresses the environmental competence and awareness required of Ricoh employees as well as any person performing a task on behalf of Ricoh Canada.

Ricoh identifies all necessary training needs and competencies and ensures all employees and independent contractors are made aware of their roles and responsibilities in the EMS, particularly with respect to those activities related to significant environmental aspects.

Procedures have been established and maintained to make all employees and on-site contractors aware of:

- The importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;
- The significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;
- Their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;
- The potential consequences of departure from specific operating procedures.

All relevant employees, and where necessary, on-site contractors at Ricoh shall also have the appropriate training, competence and awareness so that their activities are conducted in a manner consistent with the EMS.

4.4.3 Communication

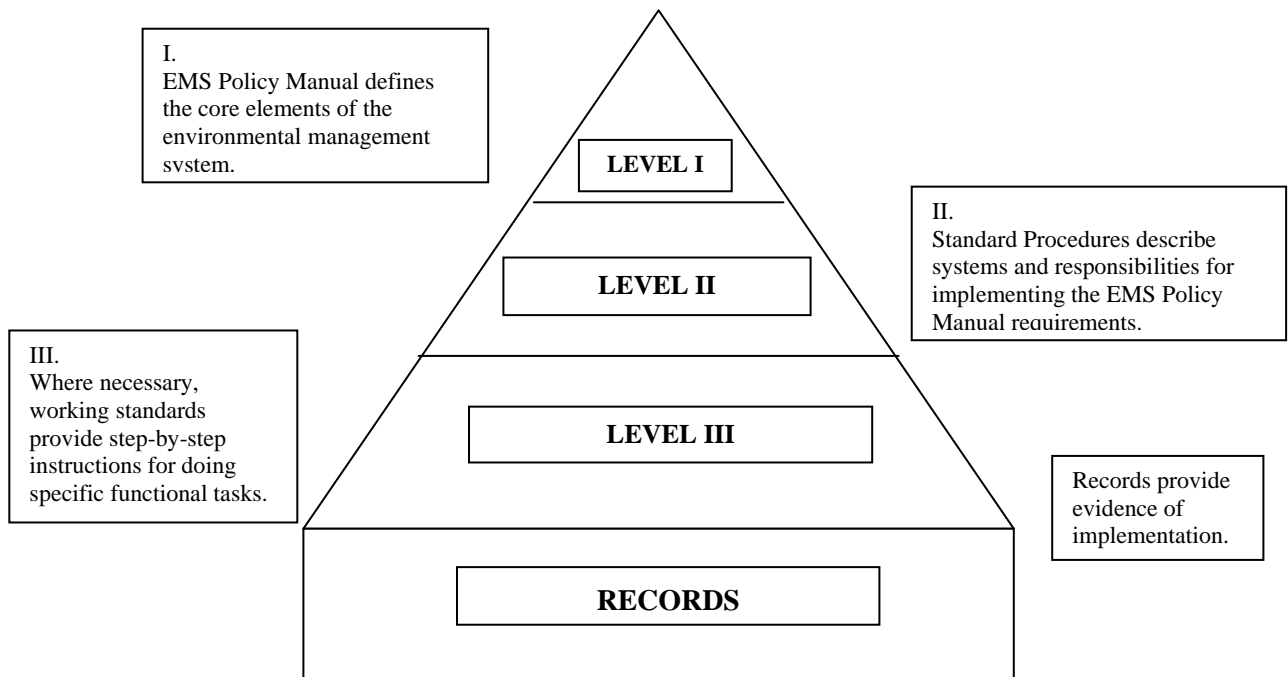
Ricoh's Internal and External Communication procedure EMS-015, addresses the communication of environmentally related information to its employees and to the public. The internal communication shall be sufficient to allow employees to understand their roles and meet their responsibilities within the EMS, and for management to lead and support the EMS. The external communications section covers how Ricoh receives, documents and responds to communications requests from external parties (such as communications from regulatory agencies). Ricoh has chosen not to communicate to outside parties regarding its significant environmental aspects.

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 8 of 14	Date: January 1, 2008	Title: Environmental Management Representative

4.4.4 Documentation

This Manual describes the core elements of the Ricoh EMS. This manual refers to procedures that describe specific requirements of the EMS in greater detail, and where appropriate to the ISO 9001:2000 Quality Management System. Documented work procedures are established at the functional level as required. Records providing evidence of various environmental activities and events have been established and maintained. And, documents, including records, determined by Ricoh to be necessary to ensure the effective planning, operation and control of processes that relate to its Significant Environmental Aspects have been established and maintained.

EMS Documentation Structure



RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun	
Page 9 of 14	Date: January 1, 2008	Title: Environmental Management Representative	

4.4.5 Control of Documents

Ricoh uses the existing ISO 9001:2000 procedure Document Control: QMS300, to control its internal and externally produced environmental documents and data that are necessary for the planning and operation of the EMS.

Ricoh has established an Operational Control Procedure, to address the controls required to manage its significant aspects. Operation and activities associated with identified significant environmental impacts are identified and planned to ensure they are carried out under specified conditions.

4.4.6 Operational Control

Operational controls can be specific work instruction and procedures, stipulating operating criteria, to direct employees on how to do their jobs. Training of pertinent personnel and the inspection and maintenance of physical equipment also form an important part of operational controls.

Ricoh also implements procedures to control the identifiable significant aspects of goods and services used by each facility, such as purchased chemicals. Procedures and requirements are communicated to the suppliers of these goods and services and their activities are monitored to ensure conformance to these requirements.

4.4.7 Emergency Preparedness and Response

Ricoh has established an Emergency Preparedness and Response Procedure EMS-016, identifying and responding to scenarios that are reasonably foreseeable at each location. The emergency response plan defines and draws upon the cross functional expertise necessary to take into account, mitigating the impact and related issues such as worker health and safety, media relations, insurance and reporting requirements.

The emergency response procedures are reviewed regularly, particularly after a related incident or the planned testing of the procedures, and revised as necessary.

4.5 Checking and Corrective Action

4.5.1 Monitoring and Measurement

The Environmental Monitoring and Measurement procedure EMS-017, has been implemented to measure environmental activities. Operational control procedures control the activity being measured. The procedures include checks to ensure that relevant operational controls are actually being followed.

Performance monitoring and measurement information is periodically reported to senior management as part of management review.

The procedure includes the process for periodically evaluating compliance with relevant environmental legislation. Conformance to Ricoh's environmental objectives and targets is monitored through the Management Review process.

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 10 of 14	Date: January 1, 2008	Title: Environmental Management Representative

4.5.2 Evaluation of Compliance

4.5.2.1. Ricoh has established, implemented and maintains (EMS-012) Legal & Other Requirements to periodically evaluate compliance to applicable legal requirements to which Ricoh subscribes.

4.5.2.2. Ricoh has established, implemented and maintains (EMS-012) Legal & Other Requirements to periodically evaluate compliance to applicable other requirements to which Ricoh subscribes.

4.5.3 Non-conformance and Corrective and Preventive Action

Ricoh uses the existing ISO 9001:2000 Corrective and Preventive Action procedure QMS330, for handling, investigating, mitigating impacts, correcting and preventing the recurrence of non-conformances. Changes in documented procedures, due to corrective actions are recorded and implemented, and all corrective and preventive actions are recorded into the NCCA Log and reviewed, in regards to their effectiveness at Steering Committee meetings.

Non-conformance includes the failure to conform to ISO 14001, applicable legal and other requirements, EMS procedures, operational controls and work instructions, environmental incidents and recommendations from external reports. A critical element of corrective action taken, appropriate to the problem and impact, is to avoid recurrence of the problem.

4.5.4 Control of Records

Ricoh maintains records sufficient, and as necessary, to demonstrate that the EMS has been implemented in accordance with the Ricoh EMS requirements and ISO 14001 as per the existing ISO 9001:2000 procedure: Control of Records: QMS340.

4.5.5 Environmental Management System Internal Audit

Ricoh EMS is periodically audited in accordance with the ISO 9001:2000 Internal Audits procedure, QMS350, which addresses the audit scope, frequencies, methodology and responsibilities. EMS audits evaluate and verify conformance to planned arrangements and to the requirements of the Standard, and ensure that the EMS is effectively implemented. Where appropriate, corporate and divisional environmental managers may assist facilities to develop, implement and maintain their EMS auditing programs. And, the selection of auditors and the conduct of the audits will ensure objectivity and impartiality of the audit.

The audit results are presented to management for review at Steering Committee Meetings.

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun Title: Environmental Management Representative	
Page 11 of 14	Date: January 1, 2008		

4.6 Management Review

Ricoh periodically reviews the suitability, adequacy, and effectiveness of the EMS as set forth the existing ISO 9001:2000 Management Review procedure QMS100.

The management review process may also address the potential environmental issues associated with planned changes in volume or nature of products and processes and the related changes to the policy, objectives or other elements of the EMS.

RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun Title: Environmental Management Representative	
Page 12 of 14	Date: January 1, 2008		

APPENDIX ONE

Procedures in the EMS Manual

- **Identification and Evaluation of Environmental Aspects (EMS-011)**
- **Legal and Other Requirements (EMS-012)**
- **Objectives Targets and Programs (EMS-013)**
- **Training Requirements (QMS-360)**
- **Internal and External Environmental Communication (EMS-015)**
- **Document Control (QMS-300)**
- **Environmental Operational Controls (EMS-018)**
- **Emergency Preparedness and Response (EMS-016)**
- **Environmental Monitoring and Measurement (EMS-017)**
- **Corrective Action (QMS-330-1)**
- **Preventive Action (QMS-330-2)**
- **Control of Records (QMS-340)**
- **Internal Audits (QMS-350)**
- **Management Review (QMS-100)**

RICOH	Ricoh Canada Environmental Policy Manual	Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun
Page 13 of 14	Date: January 1, 2008	Title: Environmental Management Representative

APPROVALS

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PRESIDENT & CEO:

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RICOH	Ricoh Canada Environmental Policy Manual		Issue Date: July 2001
No: EMS-010	Revision No.: 5	Approved by: Kevin Braun Title: Environmental Management Representative	
Page 15 of 14	Date: January 1, 2008		
