

# Joint Entity Modern Slavery Statement 2022

FUJIFILM Australia and  
FUJIFILM Business Innovation Australia



This Statement comprises the Joint Modern Slavery Statement of FUJIFILM Australia, FUJIFILM Holdings Australasia Pty Ltd, FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Ltd, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth), for the financial year ending 31 March 2022.

This Statement was approved by the Board of Directors of FUJIFILM Australia Pty Ltd and FUJIFILM Holdings Australasia Pty Ltd respectively on November 14th and 15th 2022.



**Ryuichi Matoba**  
CEO

This Statement was approved by the Board of Directors of FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Ltd on 24th October 2022.



**Takashi Otani**  
Managing Director



## 2022 Modern Slavery Statement

- **FUJIFILM Holdings Australasia Pty Ltd** and **FUJIFILM Australia Pty Ltd** (together “FFAU”) join,
- **FUJIFILM Business Innovation Australia Pty Ltd** and **FUJIFILM CSG Limited** (together “FBAU”) (all entities ultimately owned by **FUJIFILM Holdings Corporation** in Japan)

as joint reporting entities (“we” or “our”) in Australia. We are committed to the highest standards of ethical behaviour and integrity in all actions we do in business, as well as our impact on the communities we touch around the globe.

In accordance with the Australian **Modern Slavery Act 2018**, this is our third Statement on the measures implemented within our businesses to assess and address modern slavery risks in our operations and supply chains.

Our ultimate parent company, FUJIFILM Holdings Corporation in Japan, has been a participant of the United Nations Global Compact (UNGC) since June 2020. FBAU’s Japan based parent, FUJIFILM Business Innovation Corp, has been a member of the UNGC since August 2002 and participant from 2010. The participation of FUJIFILM Holdings Corporation and FUJIFILM Business Innovation Corp in the UNGC cements their commitments individually, and through their subsidiary businesses, to support the UNGC’s ten principles to address human rights, labour rights, environmental initiatives and anti-corruption. FUJIFILM Holdings Corporation published the **Fujifilm Group Human Rights Statement** in June 2018 applicable to all personnel in the Fujifilm Group, and the related businesses in the UK. FUJIFILM UK Limited has published its **UK Modern Slavery Statement** in line with UK legislation since 2015.

On 1 April 2021, Fuji Xerox Australia and CSG Limited as previous joint reporting entities, changed their company names to **FUJIFILM Business Innovation Australia Pty Ltd** and **FUJIFILM CSG Limited**, respectively, following a change of name within our parent operating companies in Japan.

# The Reporting Entities

A

FUJIFILM Holdings Australasia Pty Ltd is an Australian incorporated company, which is the direct or ultimate holding company of the Australian and New Zealand Fujifilm Group companies referenced in this section (A).

FUJIFILM Australia Pty Ltd is an Australian incorporated company and a wholly owned subsidiary of FUJIFILM Holdings Australasia Pty Ltd.

The other Australian and New Zealand companies which are subsidiaries of FUJIFILM Holdings Australasia Pty Ltd comprise:

- DS Chemport (Australia) Pty Ltd;
- Fuji Hunt Asian Pacific Holding Pty Ltd;
- FUJIFILM Holdings NZ Limited; and
- FUJIFILM NZ Limited.

FUJIFILM Australia Pty Ltd, DS Chemport (Australia) Pty Ltd and FUJIFILM NZ Limited are operating companies.

DS Chemport (Australia) Pty Ltd carries on a manufacturing business for FUJIFILM Australia Pty Ltd, but has no employees or suppliers of its own.

FUJIFILM Holdings Australasia Pty Ltd, Fuji Hunt Asian Pacific Holding Pty Ltd and FUJIFILM Holdings NZ Limited are non-operating companies and do not have any employees or suppliers of their own.

B

FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Limited are companies incorporated in Australia.

- FUJIFILM Business Innovation Australia Pty Ltd is wholly owned by FUJIFILM Business Innovation Asia Pacific Pte Ltd (FBAP), a company incorporated in Singapore.
- FUJIFILM Business Innovation Australia Pty Ltd is the parent company of FUJIFILM Upstream Solutions Pty and is the operational controlling company for FUJIFILM CSG Limited and FUJIFILM CodeBlue Australia.
- FUJIFILM CSG Limited, acquired in February 2020, is a wholly owned entity of FBAP.
- In turn, FBAP is a wholly owned entity of FUJIFILM Business Innovation Corp, a company incorporated in Japan.

**FUJIFILM Holdings Corporation is the ultimate parent company of all Group companies and entities listed in Sections [A](#) and [B](#).**



# Corporate Values

Our corporate values state that an open, fair and clear corporate culture is the basis for all our activities.

## Respect of human rights

We respect and do not infringe on the human rights guaranteed by the Universal Declaration of Human Rights and other international declarations, conventions, guidelines and applicable laws and regulations, as well as judicial precedents.

## Respect and promotion of diversity

We will embrace diversity to generate value and contribute to a richer society through respecting, accepting and being inspired by each employee's personality and individuality, unconstrained by differences in backgrounds or beliefs.

## Prohibition of discrimination

We respect one another as individuals, and do not discriminate on the grounds of nationality, age, gender, sexual orientation or gender identity, race, ethnicity, religion, political opinions, ideologies, national or social origin, or disability, nor do we base decisions regarding hiring, promotion or advancement, benefits, or educational opportunities on these factors.

## Prohibition of bullying and harassment

We do not speak or act in ways that degrade individual dignity or that disadvantage or threaten individuals based on issues such as gender, authority or position (sexual harassment or power harassment), nor do we engage in any other form of bullying or harassment.

## Protection of privacy

We do not share or disclose information relating to individuals' private lives gained in the workplace or in the course of our duties without the clear consent of the individual concerned. We will appropriately manage any personal data we receive in accordance with all applicable laws and regulations.

## Promotion of work-life balance

We aim to support employees' high performance in the workplace and their personal circumstances and responsibilities. In order to do this, we will work together to pursue the professional development of ourselves, our colleagues, and the people with whom we interact in the course of our duties, while we respect individual needs and are understanding of personal circumstances, including family care responsibilities such as childcare and nursing care.

## Prohibition of forced labour / child labour

We do not take part in any form of forced labour or child labour, including slave labour, bonded labour or human trafficking. We enable the free choice of employment through proper employment processes, and take required measures to prevent forced labour and child labour.

## Promotion of occupational safety and health

We comply with applicable occupational health and safety laws and regulations, such as those designed to prevent workplace accidents. We will give due consideration to the physical and mental health of ourselves, our colleagues, and the people with whom we work, and aim to maintain and enhance safe, healthy and fit working environments.

## Respect of labour rights

We respect and do not infringe on labour rights in accordance with local laws and established practices, including workers' rights to organize and bargain collectively.

Our commitment to conduct our business in accordance with these values is set out in our Corporate Philosophy, available via the following link:

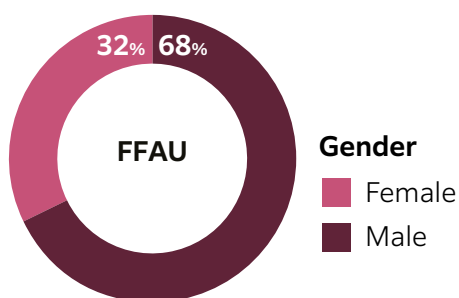
<https://holdings.fujifilm.com/en/about/philosophy> >

# Business Divisions

## FFAU, through its operating entities FUJIFILM Australia Pty Ltd and FUJIFILM NZ Limited

Photo Imaging
Electronic Imaging
Graphic Systems
Medical Systems
Recording Media, Optical Devices and Industrial Products

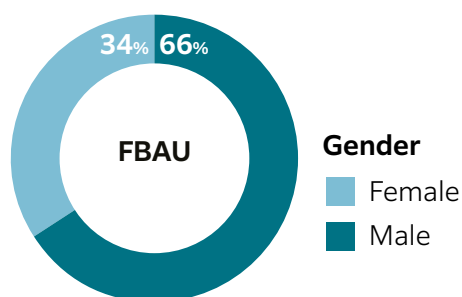
### GENDER DIVERSITY



## FUJIFILM Business Innovation Australia and FUJIFILM CSG Limited (FBAU)

Customer Support Organisation	Finance & Administration
Enterprise Document Solutions & Services	People & Culture
Sales	Marketing
Corporate Affairs	Solutions
Supply Chain	CodeBlue

### GENDER DIVERSITY



## Lines of business

FUJIFILM Australia Pty Ltd and FUJIFILM NZ Limited are distributors of Fujifilm manufactured products and services, and service providers in relation to Fujifilm products in Australia and NZ (respectively), for a range of industries including medical, graphic arts, recording media, optical, industrial and photographic technologies.

FBAU is also a distributor of Fujifilm manufactured products and services, delivering enterprise document solutions and services to all business sectors, ranging from government departments, large enterprises, healthcare services, to educational institutions. Through our portfolio of document technology, services, software and supplies, we provide essential back-office support that paves the way for customers to focus on their core business.

Together, our technology products and services aim to solve a wide range of common business challenges across multiple industries, and in many instances, transform work practices.

## Core lines of business

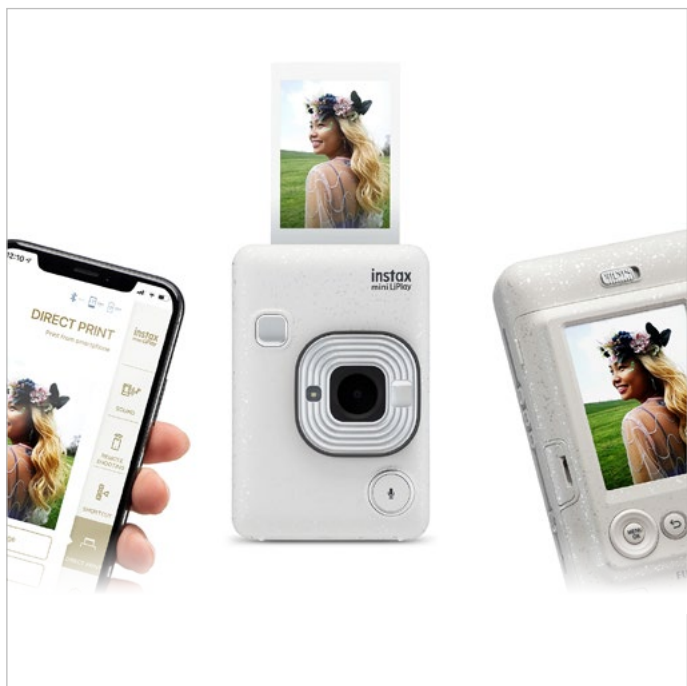
FUJIFILM Australia Pty Ltd and FUJIFILM NZ Limited's core lines of business are explained below:

- The Photo Imaging, Recording Media and Industrial Product division supplies photo printing solutions including printer hardware, photo kiosks, software, photo paper, chemistry, ink consumables and product/system support, together with consumer products such as the instax range of instant cameras, film and printers. The division also supplies products including data storage media.
- The Electronic Imaging and Optical Devices division supplies digital cameras and lenses, binoculars and security cameras.
- The Graphics Systems division supplies large format printers, plate, chemicals, ink consumables, and product/system support.
- The Medical division supplies x-ray imaging equipment, film, software solutions for image and information capture, reporting, retrieval and archiving and product/system support.

FBAU, as a leader in Australia and around the globe for innovative print technologies and intelligent work solutions, focuses on:

- Office Products and Printers: Providing office equipment such as multifunction devices and printers as well as related solutions.

- Production Services: Providing digital printers and printing workflow solutions in the commercial printing segment focusing on graphic communications – from creating content to processing delivery.
- Solutions and Services: Providing document & IT services – which include system integration, cloud services, management of multifunction devices and Business Process Outsourcing of mission-critical processes – tailored to various industries or business processes to meet business challenges.



# Structure, operations and supply chains and risk assessments

The FFAU and FBAU **Product** supply chain is controlled by other Fujifilm Group companies (operating from Japan, China, Korea, Vietnam and United States of America) and managed ultimately under the direction of FUJIFILM Holdings Corporation. The product supply chain includes raw material providers, electronic component manufacturers, transport and logistics providers, as well as our own Fujifilm manufacturing plants in those respective countries.

We are committed to ensuring there is no modern slavery or human trafficking in our product supply chain. FUJIFILM Holdings Corporation has implemented a human rights due diligence process in accordance with the procedures set out in the UN Guiding Principles on Human Rights covering all business activities in which it is involved. To

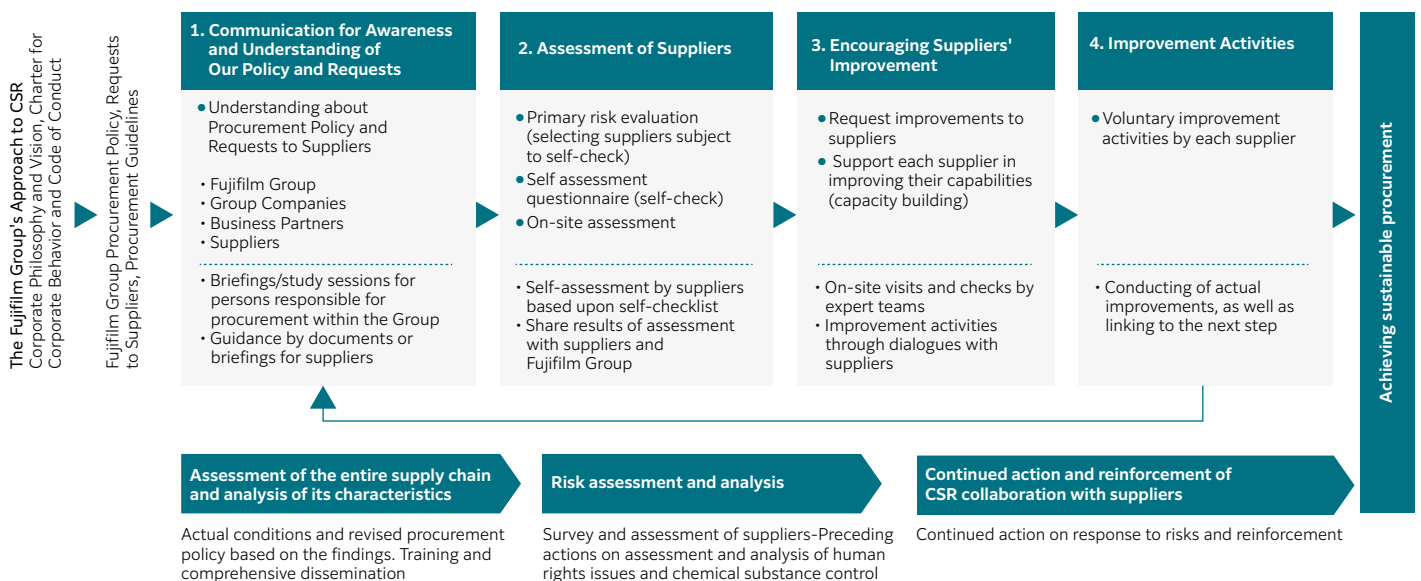
facilitate that process, FUJIFILM Holdings Corporation referred to the requirements in the UN Guiding Principles Reporting Framework with Implementation Guidance. In the Fujifilm Group priority issues concerning human rights are escalated, along with the progress of preventative or mitigating measures, to the FUJIFILM Holdings Corporation’s ESG Committee for their deliberation and subsequent reporting to the FUJIFILM Holdings Corporation’s Board of Directors.

Our associated Group companies comply with the [Fujifilm Group Charter for Corporate Behaviour](#), [Fujifilm Group Code of Conduct](#), and [Fujifilm Group Human Rights Statement](#) which reflect our commitment to acting ethically and with integrity in all our business relationships.

At the time of publishing this third Statement, we recognise the [ILO publication dated Sept 2022](#), regarding Global Estimates of Modern Slavery. We recognise that it is estimated that some 49.6 million people are estimated to be in modern slavery on any given day, either through forced labour or forced marriage. Further it is estimated that the Asia and Pacific regions are host to half of this global total and it is stated that forced labour is an issue regardless of a country’s wealth.

Corporate Social Responsibility (CSR) is an important measure of our Fujifilm Group company’s corporate values. The Fujifilm Group of companies recognises the importance of ensuring governance in our supply chain practice and operations. Our CSR actions are lead indicators on our efforts to tackle and resolve social issues in the countries we operate from.

## Fujifilm Group Ethical Procurement Promotion Program





- Within this structure and governance for the manufacturing of our products, we assess the risk of modern slavery to be low, but we continue to recognise that any organisation can be vulnerable without continued focus on compliance and governance on a continuing basis. Our reasoning is explained under the section Actions which speaks to our Ethical Procurement activities undertaken in the countries we operate from.
- We also invite third party assessment on our supply chain practice. For example, our headquarters in Japan continues to participate in an annual assessment with EcoVadis, (a global provider of sustainability ratings for global supply chain organisations, covering key criteria including environment, labour and human rights, ethics and sustainable procurement) with our most recent scorecard published in Sept 2022.

Our **Distribution** supply chain consists of transport and logistics providers from points of origin to destination, via road, sea or air freight, and ultimately to our customers operational locations.


















- Our service providers in this part of the supply chain encompass international and Australian businesses whose employees have qualifications and skills that are unlikely to be exploited through forced labour. We assess the risk of modern slavery in this part of the supply chain to be



low, but we recognise that we need to be vigilant and continue the dialogue and education of modern slavery risks and compliance with all safe work practices with our service providers.

- With the impact of COVID-19 on the seafaring supply chain, we can confirm that our Group companies have moved to swiftly and only utilising service providers who are signatories to the “Neptune Declaration on Seafarer Wellbeing and Crew Change”. This action addresses the International Maritime Organisation framework of protocols for ensuring Safe Ship Crew Changes and travel during the Coronavirus pandemic, adopted following the United Nations General Assembly resolution on 1 December 2020.

Our **Solutions, Services and Re-sale** supply chains include, in the vast majority, Australian based third party suppliers of products and services for our medical, photo imaging, graphics, document related services & IT related services for re-sale, as well as consumption of products and services to operate our business on a day to day basis. These may include:

 Audio-visual equipment/service	 Catering products and services	 Consultancy services	 Couriers	 Educational services	 Financial services
 Insurance services	 IT equipment/software/hardware/services	 Maintenance services	 Marketing/advertising/design services	 Professional services	 Property management services
 Recruitment services	 Security services	 Supplies for our offices and other sundries	 Training services	 Travel and accommodation services	 Utilities

- Our service providers in this section of the supply chain are, in the vast majority, Australian based businesses. Continuing on from our last Statement, we have focussed on assessing and communicating with providers operating in high risk industries or countries assessed as high risk to instances of modern slavery and human trafficking.
- In addition, we reflect on our own internal organisation procedures and continue to be audited for our management standards and protocols for ISO 9001 and ISO 14001 and in respect of FBAU ISO 27001 certification. Additionally, FBAU has enlisted a Self-Assessment of internal processes utilising Sedex (a world leading ethical trade membership organisation).

# Actions



The [Fujifilm Group Charter for Corporate Behaviour](#), [Fujifilm Group Code of Conduct](#), and [Fujifilm Group Human Rights Statement](#) are applicable to all personnel of the Fujifilm Group of companies.

International guidelines and other references used in creating the Charter for Corporate Behaviour and Code of Conduct include:

- International Bill of Human Rights
- ILO (International Labour Organization) Core Labour Standards
- The Ten Principles of the UNGC
- United Nations Guiding Principles on Business and Human Rights
- ISO 26000 Guidance on social responsibility
- Children's Rights and Business Principles
- United Nations Convention against Corruption
- Sustainable Development Goals (SDGs)
- Responsible Care Global Charter
- Paris Agreement
- The OECD Guidelines for Multinational Enterprises
- Responsible Business Alliance Code of Conduct
- Keidanren (Japan Business Federation) 2017 Charter of Corporate Behaviour

## Membership of the Responsible Business Alliance and educating direct suppliers

FUJIFILM Business Innovation Corp has been leading promotion of ethical procurement in the Group since 2007. The company has an overseas production rate as high as 90% and belongs to the electrical and electronic industry, where demand for socially responsible management has been strong since its earliest days. Through our procurement scheme, FUJIFILM Business Innovation Corp: (1) adopts the international ethical procurement standards required by the Responsible Business Alliance (RBA), which includes many other leading electrical and electronic industry participants as members; (2) offers direct suppliers the expertise gained by Fujifilm Business Innovation and FUJIFILM Manufacturing Shenzhen Corp. (a major FUJIFILM Business Innovation Corp production site); and (3) makes and distributes management tools (management guidelines and self-checklists) to our direct suppliers. Utilizing these management tools, suppliers have become able to check their own procurement soundness and establish improvement plans by themselves. Also, running the Plan, Do, Check, Act cycle for procurement every year ensures steady improvements. FUJIFILM Business Innovation Corp requires all of its suppliers to conform to 90% or more of the "very important" items in the CSR Self-Checklist. Currently, the average conformance rate remains around 90% and since FY2015 FUJIFILM Manufacturing Shenzhen Corp. has been free from any production line stoppages caused by CSR risks in its suppliers. Going back further, FUJIFILM Business Innovation Corp began requests to some of its suppliers to conduct self-assessment from the CSR viewpoint in 2009, in addition to conventional communications concerning the chemical substances contained in products. This self-assessment has been expanded to other suppliers and now covers 80% of each business division's procurement.

## Ethical procurement practice across the Fujifilm Group

In FY2018 we extended the procurement management that FUJIFILM Business Innovation Corp had developed to Fujifilm's production subsidiaries in order to reinforce and deepen the procurement policy across the Fujifilm Group. As the first site to introduce this scheme, we appointed FUJIFILM Imaging Devices (Suzhou) Co., Ltd., Fujifilm's major production site for digital cameras and instant camera systems, for which customers have been increasingly demanding CSR management over suppliers in recent years. The procurement management has already started in cooperation with FUJIFILM Manufacturing Shenzhen Corp., which has knowhow in assessment and improvement support in China. We continue to reinforce our CSR management across the supply chain by sharing knowhow within the Group.

As reported in our second Statement, the Fujifilm Group adopted two important new policies enhancing our measures in the field of human rights. Firstly, the Fujifilm Group Global Healthcare Code of Conduct, recognising our increasing business in healthcare, was issued and training provided to all Fujifilm Group employees involved in the healthcare business around the world. In addition, the Fujifilm Group AI Policy established basic principles for the application of AI technology, such as respect for human rights and fair and appropriate use of the technology, for our various businesses to guide the drive to accelerate the use of technology to resolve social issues.

### Background for Implementing Ethical Procurement

It is often said that in areas of Asia where production bases are concentrated, on-site labour issues and insufficient environmental measures tend to result in such problems as labour disputes and factory fires. Not being immune to this rule, FUJIFILM Manufacturing Shenzhen has faced issues regarding stable operation and supply, including suspension of the company's production line due to delayed delivery of components, which was caused by suppliers' CSR risks (regarding labour affairs, human rights, the environment and corporate ethics). To help minimize these risks, the company has been implementing measures for ethical procurement since 2007.



At present, for Fujifilm Business Innovation, we assemble multifunction devices and printers, which are our mainstay products, primarily at our factories in China and Vietnam. Accordingly, we attribute importance to enhancing the foundation of CSR management with considerations toward the environment, corporate ethics, and human rights etc. across the supply chain, particularly in China and Vietnam.

To foster ethical procurement in the countries we manufacture our products from, Fujifilm Business Innovation (1) notifies its procurement policies to suppliers (including the code of conduct for suppliers and the CSR management guidelines); (2) assesses suppliers' CSR risks; and (3) asks suppliers with high CSR risks (for the environment, human rights and labour, and corporate ethics) to make improvements and then supports the improvement activities.

As a result of asking suppliers to make continuous improvements to their CSR management (to give more consideration to labour affairs, human rights, environment and corporate ethics) every year through our ethical procurement activity, the number of production line stops caused by suppliers' CSR risks was reduced to zero in fiscal 2015. In addition, FUJIFILM Business Innovation Hai Phong (Vietnam) has since fiscal 2016 continued operating with zero line stops attributable to ethical risks.

Through the application of our Group's CSR commitment, we will continue to enhance our activities to minimize suppliers' CSR management-related risks at other production sites to consistently realize zero line stops and achieve coexistence and co-prosperity with suppliers. Through these activities, we will contribute to solving issues related to the environment, human rights and labour and corporate ethics in the regions where we operate and across our supply chain toward the creation of a society where people can live safely and enjoy decent work.

## Summary and progress of actions from the last report in relation to FBAU

What we said we had in place, or enabled or would act towards, in the last report?	How did we go?	Next steps
<p>Our Human Resource / People and Culture group ensure compliance with all relevant Australian labour laws, recruitment and payrolling processes.</p> <p>The Fujifilm corporate direction of the Charter for Corporate Behaviour, Code of Conduct and Human Rights Statement outlines our ongoing commitment and is implemented via our HR policies and procedures.</p>	<p>Examples of named policies include Personal Records and Privacy, Flexible Workplace, Prevention of Harassment and Bullying, Confidential Information and Property Rights, Leave Management and Work, Health &amp; Safety.</p>	<p>Continue with policies and re-assess specific policies as required.</p>
<p>Specific training in conscious and unconscious bias has continued as a focus for recruiters and hiring managers for purposes of non-discrimination.</p>	<p>All hiring adverts are screened against bias prior to publishing.</p>	<p>Continue as an ongoing practice for all people leaders.</p>
<p>In 2020 a specific Diversity and Inclusion programme was launched, together with a commitment from the executive to support and implement a Reconciliation Action Plan (RAP). These programmes aim to promote and educate our wider ecosystem of employees, stakeholders, suppliers and community.</p> <p>Our Gender Equality and Equal Opportunity Policy has now been in place since January 2020.</p> <p>Expand the Diversity and Inclusion programme committee to broaden their reach and target: (a) 50% females as new hires by 2022; and (b) 30% of females in senior leadership by 2025.</p> <p>Develop initiatives for broadening the diversity agenda to tackle people living with a disability.</p> <p>Continue to develop our RAP and implement an action group to drive the initiatives.</p>	<p>We did not achieve our target of 50%,but are continuing to achieve 44% female hiring rate for new hires since our last report.</p> <p>Our percentage of females in senior leadership positions continues at 12%.</p> <p>Our Women in Workplace employee resource group named Elevate through various programs and tools aims to create a connected community for the women in our workplace.</p> <p>Our Procurement Policy specific to FBAU now includes a component to seek pro-actively opportunities for Social Enterprise businesses.</p> <p>Our 'Reflect' phase of our RAP was launched in May 2022.</p>	<p>We will continue to aim for our targets: (a) 50% females as new hires for the 2022/23 period, and (b) 30% of females in senior leadership by 2025.</p> <p>Continue the Elevate group in encouraging a supportive and connected workplace for women and influencing positive change to share and champion women's causes in our workplace.</p> <p>Meet the actions of our RAP as outlined for the 2022/23 period.</p>
		<p>Our use of labour hire companies is restricted to panel suppliers who are engaged via Fujifilm's own terms and conditions, inclusive of abiding with all local laws and regulations as well as auditing rights against such services.</p> <p>We have further enhanced this process by ensuring any labour hire companies selected are members of RCSA or AHRI to ensure they comply to an industry code of conduct.</p> <p>Whistleblowing Process: We have two avenues to provide a whistleblowing service (an internal service as well as a third party service) for both our own staff as well as external parties to safely and securely communicate concerns in an anonymous format should they wish to do so.</p> <p>We have further enhanced this process by updating and publishing the Policy and Procedure to our public facing website, allowing our suppliers, customers and other interested parties to easily access the service including protections available to disclosers.</p>
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What we said we had in place, or enabled or would act towards, in the last report?	How did we go?	Next steps
<p>We commenced review of our own payment terms with small to medium suppliers to ensure that we do not inadvertently or indirectly create a risk of modern slavery in our supply chain.</p> <p>Our continued review of payment terms, especially to small to medium businesses (SMB), shows that 66% of the total value of SMB invoices are paid within 21 days rising to 76% of the SMB total value paid within 30 days and 91% of the SMB value paid within 40 days.</p>	<p>The current reporting period indicated we had incrementally improved by 2% for 30 day payment terms to SMB, but missed our target of 85% SMB payments 30 days.</p> <p>65% of the total value of SMB invoices were paid within 20 days rising to 78% of the SMB total value paid within 30 days.</p>	<p>On an ongoing basis, aim to improve bottlenecks with the payment process that may lead to inadvertent risks in our supply chain and target 85% of the value of SMB invoices to be paid within 30 days.</p>
<p>We have undertaken training of procurement staff who interact directly with our supply chain on the <b>Modern Slavery Act</b>. We will progress this training and roll-out to all staff-members within the organisation.</p>	<p>Our onboarding for new employees includes human rights and modern slavery training material.</p>	<p>Our plan is to include training materials when our suppliers undertake their modern slavery assessments.</p>
<p>All new suppliers are asked to confirm their compliance and acceptance of the Supplier Code of Conduct which is based on the ten principles of the UNGC, as well as containing references to the Australian <b>Modern Slavery Act 2018</b>.</p>	<p>All suppliers prior to being onboarded continue to undergo this process.</p> <p>Our planning for incorporating compliance programmes on new platforms has been delayed until early 2023, however, our current process continues to ensure there are no gaps.</p>	<p>Continue the process as ongoing practice, even when the new platforms goes live.</p>
<p>Within this reporting period, we have undertaken a targeted assessment of our top one hundred suppliers with detailed questions on their knowledge, as well as activities in ensuring compliance with laws and regulations. We will use the output of these assessments to drive educational and targeted assessments at the remaining suppliers. We recognise that this is a continuing journey and see the assessments constantly evolving in order to tease out the risks that are indirectly hidden.</p> <p>We will extend our assessments to our top 300 suppliers to identify the indirectly hidden risks.</p>	<p>Our assessments when issued manually continue to be poorly responded to. Our focus is on the continued education of the topic to ensure the right contacts from our supplier base are responding to our assessments. The education piece is paramount due to the poor level of granularity in responses.</p>	<p>Continue as an ongoing practice, leverage technology platforms and extend our assessment to existing and new suppliers.</p>
<p>Within this reporting period, we have undertaken the following steps: (A) in phases and we will undertake further steps; and (B) on an ongoing basis:</p> <ul style="list-style-type: none"> <li>• A: Assessing the risks of different industries providing goods and services in the supply chain</li> <li>• A: Mapping the supply chain in phases</li> <li>• A: Assessing locations of major service providers</li> <li>• A: Identifying high risk countries in the production of goods and services in the supply chain</li> <li>• A &amp; B: Performing due diligence with targeted assessments in phases</li> <li>• B: Implement education and training to key suppliers and service provider channels.</li> </ul>	<p>Our phased approach continues in our third year with assessing the risks of different industries.</p> <p>Given we manufacture our own core products, our supply chain tiers that complement our sale of products to customers is predominately vertical in nature, as the industry or services are complementary to our core product sets. We will continue to map our supply chain tiers in our core verticals.</p> <p>For the consumption and day to day operations of our business, mapping our supply chain in full continues as a phased approach with priority on our Tier 1 suppliers.</p> <p>Our supplier performance management framework for our Tier 1 suppliers includes regular discussion points on modern slavery risks and impacts of Covid-19.</p>	<p>Continue as an ongoing practice.</p>

## Summary and progress of actions from the last report in relation to FFAU

What we said we had in place, or enabled or would act towards, in the last report.	How did we go?	Next steps
<p>Our Human Resources group ensure compliance with all relevant Australian labour laws, recruitment and payrolling processes.</p> <p>The Fujifilm Charter for Corporate Behaviour, Code of Conduct and Human Rights Statement outline our ongoing commitments and are implemented via our HR policies and procedures.</p> <p>Examples of named policies include Diversity and Inclusion Policy; Privacy Act Compliance Policy; our various Leave Policies; Bullying Harassment, Anti-Discrimination and Equal Opportunity Policy; and Work Health and Safety Policy.</p>	<p>Continue with policies and re-assess specific policies as required.</p>	<p>Continue with policies and re-assess specific policies as required.</p>
<p>Whistleblowing Process: We have three reporting levels available – local, regional and global. Our Whistleblowing Process facilitates the making of reports by our own staff as well as external parties safely and securely including anonymously should they wish to do so.</p> <p>The Policy and Procedure is published on our corporate website, allowing our suppliers, customers and other interested parties to easily access the service including protections available to disclosers.</p>	<p>Continue as an ongoing practice.</p>	<p>Continue as an ongoing practice.</p>
<p>We have undertaken formal training of our senior management, risk and quality teams and other staff involved in procurement on the <b>Modern Slavery Act</b>.</p> <p>Our plan is to incorporate the training into our onboarding process for all new employees and to include appropriate training materials when our suppliers undertake their modern slavery assessments.</p>	<p>We have uploaded the modern slavery training presentation to our company's document management system which is available to all employees.</p> <p>We are yet to incorporate the training into our new online onboarding process for new employees available on our HR platform ("HR Hub"), which replaces the face-to-face new employee onboarding process.</p>	<p>Our plan is to incorporate the training into our online onboarding process for new employees and to include training materials when our suppliers undertake their modern slavery assessments.</p>
<p>Completion of the review of all policies, procedures and supply agreements to ensure that they adequately address modern slavery risks, are current and meet international best practice.</p> <p>We have published on our corporate website information for our suppliers including our Procurement Policy which incorporates the Fujifilm Group Charter for Corporate Behaviour, Fujifilm Group Code of Conduct, and Fujifilm Group Human Rights Statement.</p> <p>We are currently working on updates to our standard supply agreements including our purchase order terms and conditions and standard procurement agreement for goods and services to incorporate modern slavery provisions.</p>	<p>We have updated our purchase order terms and conditions (available on our corporate website) and standard procurement agreement for goods and services, to incorporate modern slavery provisions.</p>	<p>Continue as an ongoing practice.</p>

What we said we had in place, or enabled or would act towards, in the last report.	How did we go?	Next steps
<p>Within this reporting period, we have undertaken a targeted assessment of our top sixty-six non-Fujifilm Group suppliers with detailed questions on their modern slavery compliance and initiatives. We will use the output of these assessments to drive educational programs and targeted assessments at the remaining group of the supplier base. We recognise that this is a continuing journey and see the assessments constantly evolving in order to tease out the risks that are indirectly hidden.</p> <p>Using the learning experience from our first period, in collaboration with FBAU, we intend to engage with CENTRL, an online platform providing modern slavery assessments. CENTRL will issue modern slavery questionnaires to suppliers, follow-up suppliers which do not respond or inadequately respond to questionnaires, score responses and provide risk assessments.</p> <p>We are currently preparing for the expansion of assessments to the balance of our supplier base.</p>	<p>Our engagement with CENTRL has been delayed, however, we are currently working with FBAU to initiate this managed service program. CENTRL will issue modern slavery questionnaires to suppliers, follow-up suppliers which do not respond or inadequately respond to questionnaires, score responses, provide risk assessments and educate suppliers about the topic.</p>	<p>Continue as an ongoing practice, leverage technology platforms and extend our assessment to beyond 500 suppliers.</p>





## Summary of actions for this report and future actions

- 1** The philosophy as reported in our previous Statements continues to apply. Our principles of remedying and eliminating modern slavery risks aim firstly at informing and educating our wider ecosystem of employees, stakeholders, suppliers and the immediate communities in which we operate about these risks.

  - We will continue to create and promote a dialogue about modern slavery through our business operations and will seek to incrementally do more each year to address, continue to minimise and eventually lead to eradication of the risk of modern slavery in our product supply chain.
- 2** Fujifilm does not tolerate modern slavery risks in our organisation or in our supply chains.

  - We will, at least initially, seek to remedy instances of risks identified in our supply chains instead of terminating arrangements. We believe terminating the supply without a course of remedy might only hide the problem and do nothing to resolve the root cause.
- 3** Fujifilm requires that our suppliers adopt the same standards that we adhere to. Through FBAU's supplier onboarding process, FBAU team members responsible for procurement are trained to consider potential risks of modern slavery.

  - All new suppliers are asked to confirm their compliance with and acceptance of the Supplier Code of Conduct which is based on the ten principles of the UNGC, and which incorporates references to the Australian **Modern Slavery Act 2018**.
  - We include an auditing right within our supply agreements as relevant to the products and services being consumed or re-sold.
  - We include as a standard clause in our supply agreements a requirement for compliance with all local laws and regulations, including, where applicable, an obligation to ensure compliance with all such laws by the supplier's own sub-contractors and suppliers.
  - In our requests for tenders, we will include criteria on mapping the supply chain of the required product or service.
  - In our supplier relationship management framework, we will include, as a standing topic, discussion points on modern slavery and the impact of COVID-19 in our supply chains, including early indicators of modern slavery risks.





4 Fujifilm has developed a remediation plan should a modern slavery risk be suspected based on a hub and spoke model of the supply chain map.

- The plan addresses actions based on immediate and direct access to a risk suspected in a hub of the supply chain, as well as actions should the suspected risk be identified in a spoke of the supply chain.
- Fujifilm will work directly with the supplier should a risk be converted from “suspected” to “identified” to further investigate and understand the root cause of such a risk and prepare countermeasures to address the risk and remediate any incidents. Fujifilm will implement confidentiality as required or appropriate to ensure no further harm to the person(s) suffering or impacted as a result of any incident.
- Should the suspected risk be further down the spoke of our supply chain, Fujifilm will work with the immediate direct supplier that is impacted and their direct suppliers to investigate the risk and enable countermeasures should the risk be identified and, when appropriate, to remediate an incident.
- As investigations take time, especially in a suspected spoke risk, it may be prudent to maintain confidentiality to protect persons who are impacted by the harm.

- Investment by the relevant Board will be sought to investigate suspected risks should the risk be in a different country to our operations.
- Investment by the relevant Board to provide a remedy would be sought should an incident be identified in a hub or spoke of our supply chain.
- Investigations may also include involvement of local NGO’s in-situ to the country of risk, as well as investigation of common customers or clients who share the same risk, and, as the case may be, involvement of local authorities.

5 As we become more aware of newer technology platforms for auditing, reporting and assessment of suppliers, we will continue to assess the effectiveness of such platforms and build the business case where appropriate for adoption.

# Assessment of Effectiveness

Fujifilm re-iterates that as an outcome of our actions leading towards our third Modern Slavery Statement, the education, communication and knowledge of the **Modern Slavery Act 2018** (Cth) will continue to be schooled progressively across our supplier chain base.

Within this reporting period, we again assess that cascading this knowledge has been welcomed by many in our supplier base, whilst we continue to understand that others in the supplier base have not yet had the opportunity to invest in the necessary actions themselves. We understand from responses received that many businesses, especially due to the impact of COVID-19, have not yet been able to prioritise action plans for modern slavery risks.

We will continue additional actions in high risk industries, such as ensuring our sea-freight is utilised only by signatories to the Neptune Declaration on Seafarer Wellbeing and Crew Change, and ensuring that our payment to suppliers is timely and not creating any inherent risks.

FBAU have standardised our supplier onboarding assessments for early identification of products and services from high

risk countries or industries. Akin to our report from the last Statement, from our understanding of the supplier onboarding process, our own suppliers have themselves not always implemented a robust mapping of their supply chains. This is an action that needs to be driven by more than just Fujifilm as a corporate entity. We will further investigate the use of any technology platforms that can assist this process. We also look forward to investigating with additional ethical trade organisations to enable and improve the robustness of our onboarding processes as well as re-visit existing suppliers to enable a greater level of granularity.

[The latest ILO Sept 22 publication](#) is concerning from a global perspective. The Fujifilm Group is committed to tackling and resolving social issues such as forced labour. In the countries we manufacture in, the Fujifilm Group has implemented robust governance and supply chain practices to remove such labour vulnerabilities for the products we manufacture. We are committed to educating and assisting our direct suppliers in these countries with their own actions. FUJIFILM Holdings Corporation as at June 2021 has received the following evaluations on its CSR activities:

## Ranking and status of SRI audit

FUJIFILM Holdings has received the following evaluations by external organisations as a corporate group that proactively promotes CSR actions toward sustainable development. It is also included in the Socially Responsible Investment (SRI) indices listed on the right.

(As of June 2021)

Survey	Evaluation for FUJIFILM Holdings
15th CSR Corporate Ranking (2021, Toyo Keizai, Inc.)	3rd out of 1,614 companies (571.2 points)
CDP	Climate Change A- Water A Supply Chain A (Supplier Engagement Leader)
2nd ESG Finance Awards Japan, Environmentally Sustainable Corporations category (Ministry of the Environment)	Committee Chair Award (Bronze)

- FTSE4Good
- FTSE Blossom Japan
- MSCI Japan ESG Select Leaders Index
- S&P/JPX Carbon Efficient Index
- CDP Water Security A List
- CDP SUPPLIER ENGAGEMENT
- 2nd ESG Finance Awards Japan, Environmentally Sustainable Corporations category (Bronze)
- Sompo Sustainability Index
- DX certification
- The 24th Environmental Communication Awards, Judging Committee Special Award for Excellence
- 2021 Health and Productivity Stock
- Sports Yell Company 2021

\* Please refer to the following website for each index.  
<https://holdings.fujifilm.com/en/sustainability/evaluation>



From an Australian perspective, in this reporting period, we have not identified any modern slavery incidents, nor have we targeted any suppliers for corrective actions, but we are conscious that in this Statement, like most other companies, we have again only scraped the surface of the many hubs and spokes, or point-to-point frameworks, in our supply chain ecosystem. Importantly, with the impact of COVID-19, many of our suppliers have been impacted with reduced resources and conflicting priorities on this topic.

Our focus is to continue measures that can educate the entire supplier chain ecosystem on this important risk.

To enable a better understanding of the deeper risks involved in our supply chain tiers, FBAU and FFAU will continue to engage with CENTRL as a platform to build actions to assess and map our local and global supply chains. This will allow future follow-up actions to assess in greater detail higher risk industries prone to modern slavery risks, identify lead or lag indicators in supplier responses, focus on sectors that are highly reliant on labour intensive products or services, or sectors that produce goods and services from high risk geographies, as identified by international organisations that report and publish on the topic of modern slavery.

The focus in our last Statement was on mapping the supply chain to target our top (FBAU: 300; FFAU: 66) non-Fujifilm Group suppliers; to learn from these initial findings with our manual assessments; to understand the levels of risks and actions that our suppliers have themselves undertaken; and allow for subsequent follow-up. We continue to review our findings and understand we need to be able to do more and in a quicker manner. Whilst not all responses have been

received or detailed, the results have enabled us to setup KPI's with our primary spoke or point to point suppliers to: (a) cascade this important dialogue down the supply chain ecosystem; and (b) commence ongoing audits on actions and measures. Using a system or platform will enable our assessments to be reviewed in a more efficient manner. Our plan is to utilise the CENTRL platform for automation of assessments within the next reporting period. Our use of the platform will enable dashboards to highlight risk areas, either potential or new, as well as focus resources on addressing corrective measures should lead or lag indicators highlight concerns. We know that our incremental actions, year on year, will support the overall ecosystem of our customers, suppliers, stakeholders and community.

FBAU have ensured all our suppliers onboarded in 2022 have committed to our Supplier Code of Conduct. This is a continuation of a process established in 2015 then reliant and referencing the ten principles of the UNGC, but now updated with references to the Australian **Modern Slavery Act 2018**. FFAU is currently working on the strengthening of its supplier onboarding processes.

The ESG Committee of FUJIFILM Holding Corporation regularly reviews the Group's ESG performance, including the effectiveness of all the Group's ESG risk mitigation strategies, which, in turn, includes all the work done to assess and address modern slavery risks in our operations and supply chains.

Within the Fujifilm Group of companies, we also participate in internal and external audits and reporting on our processes and engagement for a sustainable future.

# Consultation with Internal and External Bodies



Fujifilm's approach to sustainable supplier management is informed by the ten principles of the UNGC, to which FUJIFILM Business Innovation Corp has been a signatory since 2002, and a participant since 2010. FUJIFILM Holding Corporation has been a participant of the UNGC since June 2020.

FUJIFILM Holding Corporation has been in collaboration with the UNGC local network in Japan by participating in the Human Rights Due Diligence Group, Supply Chain Working Group and Human Rights Education Working Group. FUJIFILM Holding Corporation also participates in the Stakeholder Engagement Program organised by the Nippon CSR Consortium, the secretariat of which is the Caux Round Table Japan.

FBAU continues to participate in GCNA workshops and forums in Australia, including participation in the Modern Slavery COP (Community of Practice). The GCNA is the Australian local network of the UNGC. We encourage organisations to join, participate and align their business practices in accordance with the UNGC's ten principles.

We remain committed to collaborating with supplier industry bodies and utilising university led research on sustainable procurement that cascade and share actions of peer participants in tackling modern slavery as a whole. We have observed more organisations building technology platforms in readiness to help companies address their actions for modern slavery. We will continue to consult internally and externally on the opportunities for such platforms within our overall Group of companies, as there is no single technology panacea at this present day.

Additionally, we continue engagement with ethical trade membership organisations such as EcoVadis and Sedex. Through these audit self-assessments, we continue to find incremental operational improvements to our overall business.

FUJIFILM Holdings Corporation, as our ultimate parent company, has set our Group companies' vision for a medium term plan (VISION 2023) and long term plan (Sustainable Value Plan 2030). A key vision is to achieve by 2030 resolution of social issues through business activities, namely the priority areas of impact to our **Environment**, contributing to a **Healthy** society, contributing to a safe and secure **Daily Life** and **Work Style** that increases productivity and inspires creativity. Our plans and actions in such topics as modern slavery is a result of the vision from our corporate headquarters translating to outcomes. Here is a link to FUJIFILM Holdings Corporation's Sustainability Report for 2021:

Boards of Directors of both FFAU and FBAU have reviewed and approved this Joint Modern Slavery Statement 2022.

FUJIFILM Business Innovation Asia Pacific Pte Ltd, as the higher entity of FBAU, has also reviewed and approved this Joint Modern Slavery Statement 2022.

The FFAU reporting entities and their subsidiaries covered by this Statement operate under the same policies, standards and procedures. Further, Mr Matoba, the Chief Executive Officer of FUJIFILM Holdings Australasia Pty Ltd and FUJIFILM Australia Pty Ltd, is on the Boards of all of the Australian and NZ subsidiaries of these companies. These factors largely mitigate the need for additional formal consultation between these Group entities in Australia and NZ.

# Impact of COVID-19



Now in its third fiscal impact, the COVID-19 pandemic actions and activities continued as previously detailed.

All Fujifilm Group companies took action to help prevent the spread of COVID-19 and to protect the safety and wellbeing of its staff and those of its suppliers and customers by reducing and/or eliminating the requirements for non-essential travel and face-to-face meetings. Staff around the world who could work from home were enabled and encouraged to do so during the crisis.

To ensure FBAU and FFAU did not create inadvertent direct or indirect risks, including modern slavery risks, during COVID-19, we:

- provided payment extensions as a form of relief to our customers who requested financial aid at key timeframes during the pandemic;
- worked closely with our distribution and logistics partners to understand the impact, and plan for counter-measures, in fulfilling and meeting our customer delivery requirements;
- implemented work from home arrangements for our employees as they required;
- created and supported our COVID Safe Working Committee with the resources required to implement for safe working arrangements adjusting as required by government health orders;

- provided personal protection equipment (PPE) to our employees and additional cleaning of our premises to address health and safety risks;
- provided PPE for our staff in high touch and high sensitive workplaces; and
- monitored our supplier payment processes to ensure timeliness and remove bottlenecks.

Additionally, FBAU:

- considered and allowed payment flexibility including relief mechanisms for our sub-tenancy arrangement; and
- engaged with our key suppliers during our supplier relationship framework meetings to understand their pain-points, impact of changing government health orders, complexities faced to continue to work sustainably in meeting our requirements.

Fujifilm can state that, whilst the impact of COVID-19 was significant, no adverse risks were created for our suppliers as a result of our COVID-19 actions.

Fujifilm continues to operate through this pandemic, despite downturns in our trading volumes impacting our financial outcomes. We continue to prioritise the health and safety of our society and are proud to have operated in a flexible, supportive and considerate manner for all persons and ecosystems impacted.

# Case Study

## Sustainable Paper Procurement

FUJIFILM Business Innovation Corp formulated the rules for paper procurement in consideration of ecosystems, biodiversity and the human rights of local inhabitants. We have criteria on paper to be procured and criteria for CSR-oriented operation to request suppliers to conserve biodiversity and respect the rights of local communities as part of all their business activities. Based on these standards, we started in 2012 to achieve the stable procurement of paper in a manner that is in harmony with the sustainability of forest resources and the local community. We do so by confirming the procurement situation through on-site audits and a committee headed by the management team. Our efforts, which also won the involvement of affiliated companies and suppliers both in and outside of Japan, received high acclaim, resulting in us being awarded the Grand Prize at the 18th Green Purchasing Award for Expanding the Green Market in fiscal 2017. We will ensure paper suppliers' compliance with the rules so that we can continue to provide customers with paper that they can use with peace of mind.

## Paper Procurement Regulation Standards

1. Principles on transactions with paper suppliers (requirements for our suppliers)

- **Environment**

Suppliers shall comply with both national and regional laws and regulations in the countries where they operate, and shall conduct business in consideration of the protection of valuable local forests and their ecosystem

- **Rights of local communities**

Suppliers shall see to it that the rights of local communities, such as the right to exist, are protected, and shall fully engage in dialogue with local communities whose rights might be seriously affected by their business activities.

- **Corporate ethics**

Suppliers shall protect the rights of their workers, conduct fair transactions as a matter of routine, and avoid any association with antisocial forces or organizations.

2. Principles on paper procurement (requirements for paper suppliers that meet the aforementioned transaction criteria)



1. Paper materials shall be derived from forests managed in a sustainable manner, forests certified by a third-party organization or forests that are well managed.
2. For recycled pulp, the supplier of waste paper used as raw materials shall be clearly identifiable.
3. Chemical substances used in the manufacturing process shall be confirmed to be safe.
4. The bleaching process used for the paper shall be chlorine-free.
5. Manufacturing facilities shall have environmental management systems.

Moreover, in order to contribute to the achievement of the Sustainable Development Goals (SDGs), FUJIFILM Business Innovation Corp signed the Vancouver Declaration made in support of the SDGs and FSC® certification, showing its support to the forest certification system to ensure the sustainable management of forest resources. We are working to expand our lineup of FSC®-certified copy paper. For details on Vancouver Declaration, please see the link below:

FSC and global companies unveil the Vancouver Declaration (FSC® official website)



This Statement comprises the Joint Modern Slavery Statement of FBAU and FFAU, made pursuant to section 14 of the **Modern Slavery Act 2018** (Cth), for the financial year ending 31 March 2022. This Statement was approved by each of our Board of Directors respectively.

Our next report will be for the financial year ending 31 March 2023. We will continue to evaluate the effectiveness of the actions and procedures we take each year to continuously improve the outcomes for people worldwide impacted by modern slavery. Our aim in discovering risks in our supply chains is to eliminate such practices and provide a course of remedy. Future Statements will include progressive updates on our actions and procedures.

# Company Directory

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<p><b>Whistleblowing Service</b></p>	<p><b>Whistleblowing Service</b></p>
<p><a href="https://www.fujifilm.com/fbau/en/FUJIFILM-Whistleblower-Policy">https://www.fujifilm.com/fbau/en/FUJIFILM-Whistleblower-Policy</a></p>	<p><a href="https://www.fujifilm.com/au/en/whistleblower-policy">https://www.fujifilm.com/au/en/whistleblower-policy</a></p>
<p>Refer to section 5.6 on Disclosure Contacts</p>	<p>Refer to Section 9 on Disclosure contacts</p>

## Fujifilm Group Sustainable Value Plan 2030

<https://holdings.fujifilm.com/en/sustainability/plan/svp2030>

### Important links to information local and worldwide:

Australian Modern Slavery Act

<https://www.legislation.gov.au/Details/C2018A00153>

Australian Modern Slavery Statement Register

<https://modernslaveryregister.gov.au/>

Global Slavery Index

<https://www.globalslaveryindex.org/>

UDHR – Universal Declaration of Human Rights

<https://www.un.org/en/universal-declaration-human-rights/>

OECD Responsible Business Conduct guidelines

<https://mneguidelines.oecd.org/guidelines/>

ILO Declaration on Fundamental Principles and Rights at Work

<https://www.ilo.org/declaration/lang--en/index.htm>

ILO 2022 Report - Global Estimates of Modern Slavery

[https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_855019/lang--en/index.htm](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_855019/lang--en/index.htm)

Interested in joining the United Nations Global Compact Australia network; visit

<https://www.unglobalcompact.org/engage-locally/oceania/australia> and take action.







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