

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION FROM THE MANAGING DIRECTOR OF FUJIFILM ELECTRONIC IMAGING EUROPE GMBH

FUJIFILM Electronic Imaging Europe GmbH is a distributor of digital cameras and accessories throughout Europe.

We are a part of the group of companies owned by FUJIFILM Corporation (“**FUJIFILM Group**”). Our ultimate parent company is FUJIFILM Holdings Corporation. Both FUJIFILM Holdings Corporation and FUJIFILM Corporation have their head offices in Japan.

As a global organisation providing customers with innovative product and service solutions around the world, the FUJIFILM Group is involved in the procurement of numerous materials, components and services. In this role the FUJIFILM Group acknowledges that it is responsible for ensuring the quality and safety of its product and service solutions and appropriately managing the supply chain of materials, components and services used in their production. The FUJIFILM Group is also a significant user of services within its organisation both at a global and local level. In response to ever increasing social demands, the FUJIFILM Group is keen to fulfil its social responsibilities across its entire supply chain. The scope of this responsibility covers the global environment, ethics, human rights, health and safety and other labour conditions of those working within the supply chain from a corporate social responsibility perspective. Under a partnership with its suppliers based on mutual understanding and trust, the FUJIFILM Group aims to build a more robust and sustainable supply chain through socially responsible procurement that reduces business risks in the supply chain and increases the competitiveness and corporate value of all parties in the chain.

As part of these activities, the FUJIFILM Group continues to improve its practices to combat any kind of slavery and human trafficking. Companies within the FUJIFILM Group are required to conduct their activities in accordance with the [FUJIFILM Group Charter for Corporate Behaviour](#) and the [FUJIFILM Group Code of Conduct](#) (as revised and updated with effect from 1 April 2019), which cover a variety of ethical business principles including the prevention of slavery and human trafficking in the activities of such companies. These are available in 24 languages and have been ([along with the FUJIFILM Group Human Rights Statement](#)) disseminated to all FUJIFILM Group employees. During the year a global e-learning programme “Best Practice: Code of Conduct 2019” was rolled out to all FUJIFILM Group staff and, as at 31 March 2020, this had been completed by 99% of all such staff.

The [FUJIFILM Group Human Rights Statement](#) applies to all personnel in the FUJIFILM Group. All business partners associated with the provision of any products and/or services of any FUJIFILM Group company are also expected to comply with this Statement. This is driven by a belief that respecting the human rights of workers in the supply chain increases productivity and moral action, which in turn leads to the provision of better products and services, as well encouraging innovation. The FUJIFILM Group aim to develop together with its suppliers by encouraging them to take initiatives in CSR activities to spread such positive effects. Recognizing the slavery and human trafficking impact of the conflict minerals issue, the [FUJIFILM Group's stance toward the issue of responsible minerals procurement](#) is also made clear in more detail on the FUJIFILM website and FUJIFILM Group companies are obliged to undertake the required actions in this area.

As part of the FUJIFILM Group’s commitment to these principles, FUJIFILM Corporation has designed a Sustainable Procurement Promotion Program that covers (1) dissemination of procurement-related

policies (including the FUJIFILM Corporate Social Responsibility Procurement Guidelines for suppliers (“**Supplier Guidelines**”) which cover items listed in the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#) and [FUJIFILM Group Human Rights Statement](#) that FUJIFILM Group companies request their suppliers to follow; (2) risk assessments of suppliers in high risk areas; and (3) requests to improve to any supplier facing CSR risks together with offers of support. The program is run cyclically to check on suppliers to ensure improvements have been made. This Sustainable Procurement Promotion Program has already been adopted by certain FUJIFILM Group companies in other regions of the world and will continue to be introduced at other FUJIFILM Group companies.

In addition FUJIFILM Holdings Corporation’s stated goal under its Sustainable Value Plan 2030 (SVP 2030), is to become a corporation that promotes social innovation involving all employees and action on social issues from a long-term perspective. In connection with the 15 priority issues established in the six areas of the environment, health, daily life, work style, supply chain and governance, enhancing management of the entire supply chain from the viewpoint of Corporate Social Responsibility has been established as one of the particular priority areas.

## **ORGANISATION STRUCTURE**

Beginning in 1934 as Japan's pioneering photographic film maker, the FUJIFILM Group has leveraged its imaging and information technology to become a global presence known for innovation in healthcare, graphic arts, optical devices, highly functional materials and other high-tech areas. The FUJIFILM Group has over 33,000 employees worldwide and operates in most countries around the world. The FUJIFILM Group has a global annual turnover of around £10 billion.

## **OUR BUSINESS**

FUJIFILM Electronic Imaging Europe GmbH is incorporated in Germany. Here, FUJIFILM Electronic Imaging Europe GmbH acts as European distributor of FUJIFILM branded digital cameras and accessories sourced from FUJIFILM Corporation, directly to retailers and wholesalers in Germany, Netherlands, Austria, France, the UK and Ireland. The Company also manages stock on a central basis from Düren and distributes to other FUJIFILM subsidiaries across Europe. Lastly, the Company sells to a number of third-party distributors in smaller countries, who represent FUJIFILM and sell to their local retailers. In addition, FUJIFILM Electronic Imaging Europe GmbH operates an individual country branch in the Netherlands, which supports the Dutch market.

## **OUR SUPPLY CHAINS**

We source almost all of our products from FUJIFILM Corporation in Japan. A small quantity of accessories is purchased locally, along with marketing materials and other assets which support the running of the business in Germany and Netherlands. These, along with the services we procure, are almost exclusively sourced from local suppliers based in the European markets in which we operate.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We comply with the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#), and [FUJIFILM Group Human Rights Statement](#) which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and promoting this approach in our supply chains to prevent and mitigate any human rights abuses.

As almost all of the products we sell are ultimately sourced from FUJIFILM Corporation, this is also reflected in their adoption of the Sustainable Procurement Promotion Program as referred to above.

## **OUR PROCESSES TO PREVENT SLAVERY AND HUMAN TRAFFICKING**

All FUJIFILM Group staff around the world are required to abide by the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#), and [FUJIFILM Group Human Rights Statement](#) in order to ensure that all FUJIFILM Group companies exhibit and promote ethical business activities.

FUJIFILM Holdings Corporation conducts annual screening of priority risk issues (including potential ones) in business processes at all FUJIFILM Group companies. All FUJIFILM Group companies identify priority risk issues, plan and execute necessary measures to address those issues, and manage their results. Priority issues for the FUJIFILM Group as a whole, based on the review results for each FUJIFILM Group Company, and the results of action implemented are reported to, and deliberated on by, the FUJIFILM Holdings ESG Committee and reported to the Board of Directors of FUJIFILM Holdings Corporation. This includes human rights issues. Human rights are specified explicitly as one of the perspectives requiring attention at each FUJIFILM Group Company in review of our priority risk issues. If a FUJIFILM Group Company has identified any human rights risk, it is required to develop and implement preventive and mitigating measures.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from certain FUJIFILM Group companies in other parts of Asia, Europe and North America (if any), procurement staff in those companies are expected to operate the Sustainable Procurement Promotion Program in order to seek to establish that suppliers act in accordance with the Supplier Guidelines.

As part of the initiatives in FUJIFILM Europe generally to identify and manage risk, for the products that we source from elsewhere and for services, our procurement staff work to mitigate the risk of slavery and human trafficking occurring in our supply chains in accordance with the [FUJIFILM Group Charter for Corporate Behaviour](#) and the [FUJIFILM Group Code of Conduct](#).

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

The FUJIFILM Group promotes actions to ban slavery and human trafficking from its supply chain mainly with the framework of ethical procurement.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from FUJIFILM Group companies in certain other parts of Asia and in North America (if any), suppliers of those products are requested to commit to ethical business principles in a number of areas where human rights can be affected - these include the prohibition of forced labour, child labour and inhumane treatment (including in the context of conflict minerals) as set out in the Supplier Guidelines.

FUJIFILM Corporation also use the FUJIFILM Group Supplier CSR Checklist to assess suppliers' compliance with the Supplier Guidelines where considered necessary. As a result of suppliers completing these Checklists, primary suppliers in Japan, Europe and the USA have been assessed as a low CSR risk. FUJIFILM Corporation continues to extend the request to complete these Checklists to other suppliers in Japan, Europe and the USA. In cases where significant risk is identified, FUJIFILM Corporation conduct on-site CSR audits. A number of suppliers in China and Vietnam have been

audited in the year ending 31 March 2020 resulting in requested correction of risk factors (mainly in areas of environmental standards and occupational health).

For the products that we source ourselves and for services, our activities consist of working with our suppliers to understand their approach to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

## **TRAINING**

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we work with our procurement staff to ensure they act ethically and with integrity in their interactions with our suppliers and to implement and promote this approach in our supply chains.

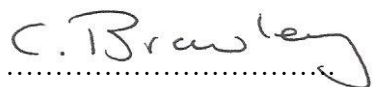
## **FURTHER STEPS**

To combat human rights risks within the supply chain, FUJIFILM Group companies will continue to promote actions with the framework of ethical procurement. The end date to which this report is prepared coincided with the beginning of the global COVID-19 pandemic. All FUJIFILM Group companies took immediate 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/or face-to-face meetings. Staff around the world who can work from home have been enabled and encouraged to do so during the crisis. It is acknowledged that the COVID-19 pandemic may affect some of the efforts to visit higher-risk supplier sites to audit their CSR status but all other CSR activities continue unaffected in the current year.

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Continue with the implementation of the Supplier Guidelines into our own procurement activities once introduced into Europe by the FUJIFILM GROUP
- Continue to monitor our suppliers in the perceived higher risk sectors to increase sensitiveness for compliant activities in this area

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for FUJIFILM Electronic Imaging Europe GmbH for the financial year ending 31 March 2020.



Christopher Brawley  
Managing Director  
FUJIFILM Electronic Imaging Europe GmbH

Date: 18 September 2020

This statement was approved by the Board of Directors of FUJIFILM Electronic Imaging Europe GmbH on 18 September 2020.