

Modern Slavery Statement

1 Introduction

- 1.1 At FUJIFILM Europe B.V. (“**FE(NL)**”), we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.
- 1.2 This is FE(NL)’s first Modern Slavery Statement pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), and it will be reviewed annually hereafter. We acknowledge that stamping out modern slavery and human trafficking risk is a process that will take time. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

2 Our organisational structure, business operations and supply chains

- 2.1 FE(NL) is incorporated in the Netherlands. FE(NL) is the European holding company for most the Fujifilm Group companies in Europe and functions as an operational and distribution centre for the Fujifilm Europe business, consisting of six business units: Photo Imaging, Electronic Imaging, Optical Devices, Medical Systems, Graphic Communication and Advanced Materials.
- 2.2 FE(NL) employs people throughout Europe and supplies Fujifilm branded products and services to the European market, via Fujifilm subsidiaries and other distributors in most countries but directly to customers in European countries including the Netherlands and to a limited extent also Canada.

- 2.3 We source many of our products from FUJIFILM Holdings Corporation, and/or its subsidiaries (collectively, “**FUJIFILM Global**”) or with respect to paper and pre-sensitised plates photographic chemicals, press-room or pre-press chemicals and accessories as well as inks from other Fujifilm Group manufacturing companies based in Europe. Other trading goods, products for internal consumption in running our facilities in the Netherlands and services are sourced from external suppliers.
- 2.4 To learn more about our business, please see [Fujifilm \[Global\]](#) (select the ‘Europe’ region)

3 Our supply chain risk profile

- 3.1 Within our operations, we have assessed our risk profile based on sector and industry risks as low. All of our workers enjoy fair and responsible employment practices and we protect and promote workers’ rights.
- 3.2 That said, we recognise that risks of modern slavery may be present in some of our supply chains where certain of our raw materials and/ or products are manufactured. We are also aware of parts of our supply chain where outsourced / contracted / subcontracted labour is used. Since a majority of such workers are not employed directly by FE(NL) or FUJIFILM Global, we have less control and visibility over their working conditions and employment terms and FUJIFILM Global continues to tailor risk management actions to address those risks. Namely, FUJIFILM Global continues its efforts to classify supplier risks and map key parts of our supply chain to identify and improve our understanding of modern slavery risks.

4 Actions taken to combat slavery risks

- 4.1 Building on the policies and procedures we currently have in place, FUJIFILM Global, including FE(NL), is in the process of developing and implementing strategies in order to:
- (a) Assess and better understand areas of potential risk in our business and supply chain;

- (b) Monitor potential risk areas in our business and supply chain; and
- (c) Reduce or mitigate the risk of slavery and human trafficking occurring in our business and supply chain.

5 Our policies on modern slavery

- 5.1 As a multinational company providing customers with innovative product and service solutions around the world, FE(NL) is involved in the procurement of numerous materials, components and services. In this role, FE(NL) 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.
- 5.2 In response to ever increasing social demands, FUJIFILM Global, including FE(NL), 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. FUJIFILM Holdings Corporation, FE(NL)'s ultimate parent company, has signed up to United Nations Global Compact, a voluntary initiative that encourages companies to undertake fair operations in the area of human rights, labour, environment and anti-corruption.
- 5.3 Under a partnership with its suppliers based on mutual understanding and trust, FUJIFILM Global, including FE(NL), aims at building 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, FE(NL) continues to improve its practices to combat any kind of slavery and human trafficking.
- 5.4 Companies within FUJIFILM Global, including FE(NL), are required to conduct their activities in accordance with the [FUJIFILM Global Charter for Corporate Behaviour](#) and the [FUJIFILM Global Code of Conduct](#) which cover a variety of ethical business principles including the prevention of slavery and human trafficking in the activities of such companies. For those of our companies

involved in the healthcare sector, the [FUJIFILM Global Healthcare Code of Conduct](#) must also be complied with. The [FUJIFILM Global Human Rights Statement](#) applies to all personnel in FUJIFILM Global, including FE(NL).

- 5.5 In addition the [FUJIFILM Global AI Policy](#) establishes 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.
- 5.6 Recognizing the slavery and human trafficking impact of the conflict minerals issue, [FUJIFILM Global's stance toward the issue of responsible minerals procurement](#) is also made clear in more detail on the Fujifilm global website and FE(NL) is obliged to undertake the required actions in this area.
- 5.7 Also, FE(NL) has further set forth expectations for suppliers by creating a [Fujifilm Europe Supplier Code of Conduct](#), which is published on FE(NL)'s website and which is currently being implemented in supply agreements and general terms and conditions.
- 5.8 Finally, 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.

6 Due diligence processes

- 6.1 FE(NL) will not tolerate any form of modern slavery and human trafficking within its supply chain. In order to identify and manage risks of modern slavery and human trafficking in our own business, we periodically reassess our employment practices to ensure we meet or surpass employment

standards in all jurisdictions in which we operate. In addition, we are in the process of implementing a new procedure that carries out background checks of selected suppliers.

6.2 In addition, FUJIFILM Global has in place systems to:

- (a) Establish, assess and monitor areas of potential risk in our business and supply chains;
- (b) reduce or mitigate the risk of slavery and human trafficking occurring in our business and supply chains; and
- (c) provide adequate protection for whistleblowers.

6.3 Such initiatives include tools such as internal/external supplier audits or checking specific suppliers with external third parties for any modern slavery risk, or in extreme cases, conducting on-site inspections.

7 Sustainable Procurement Promotion Program

7.1 FE(NL) seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights. FUJIFILM Global, including FE(NL), aims at developing together with its suppliers by encouraging them to take initiatives in Corporate Social Responsibility (“CSR”) activities to spread such positive effects.

7.2 FUJIFILM Holdings Corporation, FE(NL)'s ultimate parent company, continues to develop its Sustainable Procurement Promotion Program that covers:

- (a) Dissemination of the FUJIFILM Global's Approach to CSR. This includes FUJIFILM Global's Sustainable Procurement Guidelines for Suppliers (“**Supplier Guidelines**”) which cover items listed in the [FUJIFILM Global Charter for Corporate Behavior](#), [FUJIFILM Global Code of Conduct](#) and [FUJIFILM Global Human Rights Statement](#) that FUJIFILM Global companies request their suppliers to follow;
- (b) Supplier Assessments,

(c) Request/support for supplier's improvement activities; and

(d) Improvement activities by suppliers.

7.3 The program is run cyclically to check on suppliers to ensure improvements have been made. This Sustainable Procurement Promotion Program has been adopted by FUJIFILM Global companies in Japan and certain FUJIFILM Global companies in other parts of Asia, in Europe and in North America. This Sustainable Procurement Promotion Program (the "**SPP Program**") will continue to be introduced at other FUJIFILM Global companies around the world.

8 Training

8.1 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.

9 Remediation measures

9.1 FE(NL) takes all violations of our policies very seriously. Allegations of forced labour or child labour in our business and supply chains will be investigated appropriately and on a timely basis. During the reporting period, we have not discovered any confirmed instances of forced labour or child labour in our business or supply chain.

10 Remediation measures relating to loss of income to vulnerable persons

10.1 FE(NL) recognizes that remediation measures potentially have the unintended consequence of inflicting loss of income on vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women or children. During the reporting period, we have not discovered any confirmed instances of forced labour or child labour in our business or supply chain. To our

knowledge, we have not taken any remediation measures that would have led to loss of income to the most vulnerable families.

11 Effectiveness in combatting modern slavery risks

11.1 In order to assess the effectiveness of its actions, each year, FUJIFILM Global, which FE(NL) belongs to, evaluates the following:

- *Priority risks and corresponding action plan:* FUJIFILM Global 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. 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.
- *Supplier Vetting/Inspections:* Suppliers determined by FUJIFILM Global to be critical suppliers are requested annually to complete a checklist. In addition, some onsite risk assessments are conducted. An external risk screening tool is also utilized with over 3,000 tier 1 suppliers, mainly from China and the Asia-Pacific region being screening and monitored.
- *Whistleblowing:* FUJIFILM Global has a whistleblowing system that is monitored. In addition, FE(NL) is using Fujifilm's European whistleblowing system that is monitored locally.

12 Approval of the Statement

12.1 This Statement is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes FE(NL)'s Modern Slavery Statement for the financial year commencing on April 1, 2023 and ending on March 31, 2024.

- 12.2 This Statement was approved by the Board of Directors of FE(NL) pursuant to Paragraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on 28 May 2024.
- 12.3 In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Peter Struik

Managing Director, FUJIFILM Europe B.V.

May 28, 2024