

A low-angle, upward-looking photograph of several modern skyscrapers. The buildings are constructed with dark, metallic frames and glass facades, creating a complex geometric pattern of lines and reflections. The sky is a clear, pale blue. The overall composition is dynamic and emphasizes the height and scale of the architecture.

FUJIFILM Data Management Solutions

Modern Slavery Statement **2021**

FUJIFILM



From our
Managing Director

FUJIFILM Data Management Solutions Pty Ltd and FUJIFILM Data Management Solutions Australia Pty Ltd are proud to be issuing our second joint Modern Slavery Statement under the Australian *Modern Slavery Act 2018* (Cth), working with our employees and suppliers under the guidance of the Australian government with the overall aim of prevention and eradication of modern slavery and modern slavery risks in all business operations and supply chains in Australia and globally.

Modern slavery is a behemoth problem in the modern world that requires us to work together so that we can tackle this problem together and collectively make a difference. Unfortunately, we understand that there are inherent risks of modern slavery in all business operations and supply chains. We are therefore committed to continue in our efforts to raising awareness about all forms of modern slavery by proactively engaging with our employees, suppliers and our business partners to manage and respect human rights throughout our organisation, operations, with our suppliers and our business partners. We will continue to be committed to identify, assess, address, manage, prevent, mitigate, reduce and eradicate the risks associated with modern slavery and this Statement sets out our ongoing contribution to this effort.

A handwritten signature in black ink, appearing to read 'Brett Matthews', with a long horizontal line extending to the right.

Brett Matthews

Managing Director and Director of FUJIFILM Data Management Solutions Pty Ltd

9 July 2021

This Statement was approved by the board of FUJIFILM Data Management Solutions Pty Ltd on behalf of all the named reporting entities for the period 1 April 2020 to 31 March 2021. The Statement was approved at the board meeting held on 9 July 2021.

FUJIFILM Data Management Solutions Pty Ltd (“**FUJIFILM Data Management Solutions**”) and FUJIFILM Data Management Solutions Australia Pty Ltd (“**FUJIFILM Data Management Solutions Australia**”) are the reporting entities under the *Modern Slavery Act 2018* (Cth). This is the second Modern Slavery Statement (this “**Statement**”) for FUJIFILM Data Management Solutions and its wholly owned subsidiary entity FUJIFILM Data Management Solutions Australia (together referred to in this Statement as “**FUJIFILM DMS**”, “**we**”, “**us**” and “**our**”) for the period 1 April 2020 to 31 March 2021 (“**2021**” or otherwise referred to as the “**current reporting period**” in this Statement), in accordance with the *Modern Slavery Act 2018* (Cth). In this Statement, references to “Modern Slavery” refers to Modern Slavery as defined under the *Modern Slavery Act 2018* (Cth).

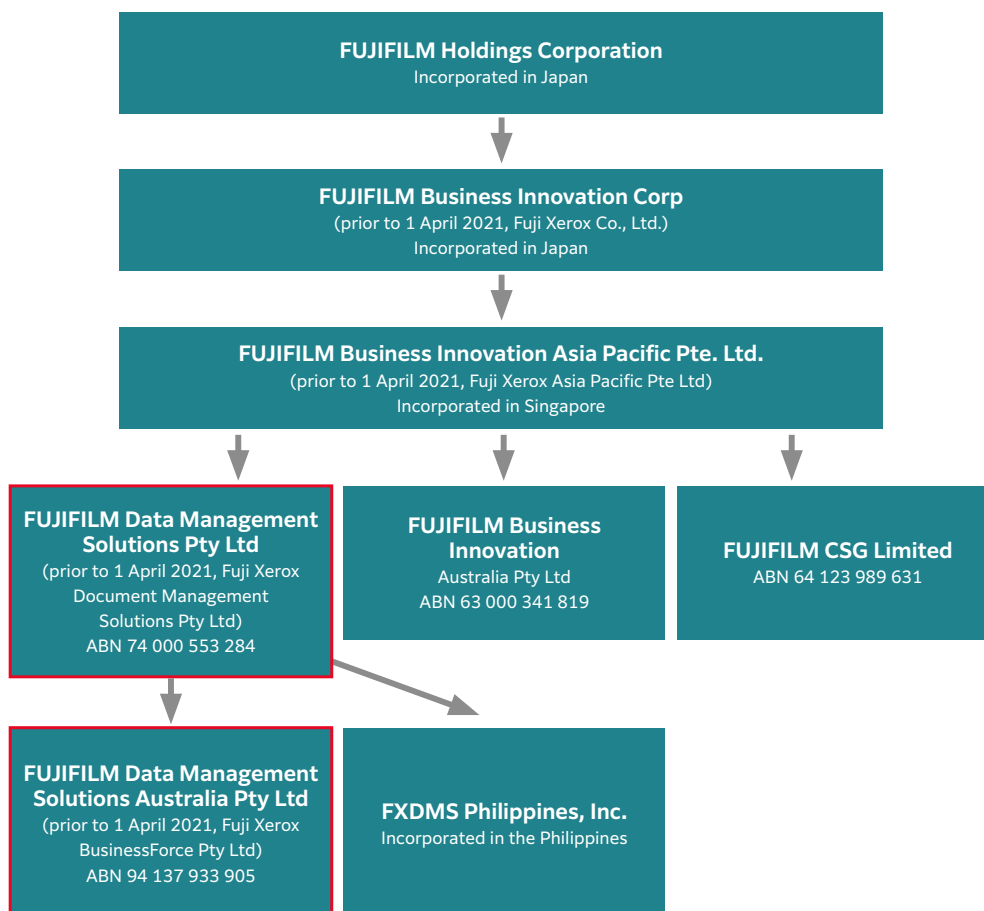
This Statement reflects FUJIFILM DMS’ progress and actions undertaken to meet the requirements of the *Modern Slavery Act 2018* (Cth) and the mandatory criteria and guidelines for modern slavery statements, with a focus on:

- identification of modern slavery risks internal to our business operations and supply chains;
- mitigation actions for any identified modern slavery risks; and
- assessment of the effectiveness of these actions.

Structure, Operations and Supply Chains

Structure:

Relevant entities under the FUJIFILM Corporate Group for the purposes of this Statement





FUJIFILM Data Management Solutions is a company incorporated in Australia with its headquarters in Sydney. It is a wholly owned subsidiary of FUJIFILM Business Innovation Asia Pacific Pte. Ltd., a company incorporated in Singapore. In turn, FUJIFILM Business Innovation Asia Pacific Pte. Ltd. is wholly owned by FUJIFILM Business Innovation Corp. a company incorporated in Japan. FUJIFILM Business Innovation Corp. is wholly owned by FUJIFILM Holdings Corporation, FUJIFILM DMS' ultimate holding company, incorporated in Japan.

Prior to 1 April 2021, FUJIFILM Data Management Solutions was named Fuji Xerox Document Management Solutions Pty Ltd, FUJIFILM Data Management Solutions Australia was named Fuji Xerox BusinessForce Pty Ltd, our parent company FUJIFILM Business Innovation Asia Pacific Pte. Ltd. was named Fuji Xerox Asia Pacific Pte Ltd which is wholly owned by Fuji Xerox Co., Ltd. On 1 April 2021, our parent and their group of companies, including Fuji Xerox Co., Ltd also changed their corporate name to FUJIFILM Business Innovation Corp, and Fuji Xerox rebranded to FUJIFILM. Our previous year's statement for the financial Year 2019 – 2020 ("**FY 2019/2020**") was submitted under our former name, Fuji Xerox Document Management Solutions Pty Ltd and Fuji Xerox BusinessForce Pty Ltd (together as "**Fuji Xerox DMS**").

Our Japan based headquarters, FUJIFILM Business Innovation Corp. has been a member of the United Nations Global Compact since 2002 and is committed to supporting and promoting human rights throughout its subsidiary businesses. It has promoted ten principles to address human rights, labour rights, environmental initiatives, anti-corruption and the fight against slavery in its subsidiary businesses' supply chains. Our ultimate parent company, FUJIFILM Holdings Corporation published the FUJIFILM Corporate Group Human Rights Statement in June 2018 (revised in April 2019), applicable to all personnel within the FUJIFILM Corporate Group and the related business in the United Kingdom ("**UK**"), FUJIFILM UK Limited has published its UK Modern Slavery Statement in line with the UK legislation.

At the end of the current reporting period, FUJIFILM Data Management Solutions had the following subsidiary entities within its corporate group in Australia, FUJIFILM Data Management Solutions Australia Pty Ltd, HPAL Ltd, Hermes Precisa Pty Ltd, A.C.N 133 915 321 Pty Ltd and a subsidiary entity in the Philippines, FXDMS Philippines, Inc. ("**FXDMSP**"). FXDMSP operates to provide IT support services to FUJIFILM DMS entities in Australia.

FUJIFILM DMS entities have shared management teams, corporate functions, key policies and processes. Therefore, a joint statement in accordance with s14 of the *Modern Slavery Act 2018* (Cth) has been prepared.

FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Limited, together with FUJIFILM DMS share the same holding entity, FUJIFILM Business Innovation Asia Pacific Pte. Ltd., as well as the ultimate parent entity of FUJIFILM Holdings Corporation and are together part of the FUJIFILM Corporate Group. However, these group of entities are unique to each other and operate separately to FUJIFILM DMS. The services and product offerings of FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Limited's group of entities, their policies and procedures, supply chains, the local management teams and the risks relating to these entities differ to that of FUJIFILM DMS. Therefore, FUJIFILM DMS has prepared a separate Modern Slavery Statement. As FUJIFILM DMS is part of the FUJIFILM Corporate Group of entities, our shared values, vision and mission is set out below.

FUJIFILM Corporate Group Values, Vision and Mission

VALUES	VISION	MISSION
We will use leading-edge, proprietary technologies to provide top-quality products and services that contribute to the advancement of culture, science, technology, and industry, as well as improved health and environmental protection in society. Our overarching aim is to help enhance the quality of life of people worldwide.	Anchored by an open, fair and clear corporate culture and with leading-edge, proprietary technologies, Fujifilm is determined to remain a leading company by boldly taking up the challenge of developing new products and creating new value.	Our mission embodies our commitment to continuously innovate and extend new frontiers that help businesses grow. We do this by; <ul style="list-style-type: none">• Providing outstanding products, services and solutions• Optimising customer's business processes across all work environments• Implementing workflows that enables effective sharing of information and knowledge, thus allowing customer to further leverage on their organisational strengths

Our commitment as a corporate group is set out via the following link:

<https://www.fujifilm.com/fbdms/our-company/>.

Operations

FUJIFILM DMS operates as a business process outsourcing services provider to its clients, providing multi-channel communications and solutions, including various document and data management and communication solutions in print, digital and online services for clients. FUJIFILM DMS operates in Australia but has an Asia Pacific outreach, including by expansion of our services overseas partnering with other FUJIFILM Corporate Group entities in the region. FUJIFILM DMS has its operations across Australia and in the Philippines. Our Philippines operations provides back office Information Technology/ Technology and Professional Services ("**TaPs**") support function to FUJIFILM DMS' overall operations.

At the end of the reporting period, FUJIFILM DMS had approximately 987 employees across various sites in Australia that includes offices, operational sites and warehouses and approximately 162 employees in the Philippines. FUJIFILM DMS' business divisions consist of: TaPS, Finance, Legal, Sales and Marketing, each state's Operations, Quality and Human Resources.

Supply Chains

FUJIFILM DMS' supply chain entails the following key sectors, which includes products and/or services in the relevant sectors:



Postal and Courier Services



Building management and maintenance



Stock and printing suppliers



IT Suppliers
(equipment and services)



Telecommunication Services



Machine/Machine maintenance



Security



Labour Hire and Recruitment



Catering



Clothing/textiles
(includes uniform suppliers)



Property Services



Electricity



Financial Services



Individual Contractors



Office Stationery



Gym/Health and Fitness



Furniture Rental



Consultancy Services



Travel Management

Based on the FY2019/2020 and FY2020/2021 FUJIFILM DMS Supplier Modern Slavery Questionnaire (“**Modern Slavery Questionnaire**”) and related responses received from the suppliers, FUJIFILM DMS identified that its key and higher risk suppliers assessed have operations in the following countries:

- Australia
- The United States of America
- The United Kingdom
- China
- New Zealand
- Vietnam
- Malaysia
- India
- Bangladesh
- The Philippines
- Brazil
- Thailand
- Indonesia
- Belarus
- Russia
- United Arab Emirates

with the majority of FUJIFILM DMS’ direct suppliers being Australian entities, having registered offices in Australia and with local operations. Notably Belarus, Russia and United Arab Emirates are the only additions to the above list since the last reporting period, information obtained through our analysis of a supplier response during this reporting period.

Approximately 40% of FY2019/2020 and FY2020/2021 suppliers who responded to the Modern Slavery Questionnaire in the current reporting period have reported using raw materials in the delivery of their services, including:

- Paper, ink, PVC, manila paper, printing and binding materials;
- Fuels;
- Metals (including steel and aluminium);
- Wood;
- Plastics; and
- Electrical components

FUJIFILM DMS will continue to work with our suppliers to further analyse the suppliers, sectors, their extended supply chains and the source or origin of raw materials that may be present in our supply chains to try and identify and address modern slavery risks that may be present in our supply chains. In doing so, FUJIFILM DMS is working with its suppliers to obtain increasingly detailed Modern Slavery Questionnaire responses and a higher response rate.

Potential Risks of Modern Slavery Practices in the Operations and Supply Chains

During the current reporting period, FUJIFILM DMS has considered and assessed the modern slavery risks that it may possibly cause, contribute and/or be directly linked to via its operations and supply chains, in accordance with Appendix 1 Table 6 set out in the Commonwealth *Modern Slavery Act 2018: Guidance for Reporting Entities* (“**Guidelines**”). In particular, we considered relevant risk indicators such as sector, entity, industry, types of products and services, and geographic risks in our risk scoping exercise as follows:

- **Sector and industry risk:** considered whether our suppliers are in industries that require temporary labour hire and considered the types of workers that are employed (such as whether migrant workers on temporary visas, low skilled workers in various sectors, informal workers and temporary and/or agency workers or workers that are unaware of or uncomfortable with claiming their legal rights or entitlements are employed);
- **Geographic risk:** considered whether our suppliers are based in countries where there are gaps in legislation and/or that are lacking in law enforcement, that have state failure to protect human rights or that has failed to address global emergencies (including pandemics);
- **Product and services risk:** considered whether our suppliers and their suppliers are in supply arrangements that have pressures to shorten timeframes and reduce cost, are in widespread and complex subcontracting arrangements with low visibility of supply chains, that have abnormally low contract costs, that vary constantly, that have short contractual terms or long payment terms, or where suppliers are unable to identify poor modern slavery detection practices for their suppliers and further down the supply chain; and
- **Entity risks:** considered whether our suppliers provide reliable and consistent responses in their questionnaires, whether the entity has a modern slavery monitoring program and the management and efficiency of suppliers’ procurement and sourcing processes.

Operations

During the previous and current reporting period, FUJIFILM DMS undertook a risk analysis to ascertain the risk of modern slavery within our own operations. This involved a review of our operations and discussions with our various business divisions to determine where the risks were highest in our own operations. As a result of the risk analysis, FUJIFILM DMS identified that our recruitment practices through the use of labour hire agencies for extra staffing support purposes in its operations and the presence of the operation in the Philippines may increase the likelihood of risk of modern slavery practices appearing in our operations. However, FUJIFILM DMS has put in place operational controls that would address and reduce any potential risk of modern slavery practices.

During this reporting period, a significant step towards minimising operational risk was the release of the FUJIFILM DMS Modern Slavery Policy (“**Modern Slavery Policy**”). Our Modern Slavery Policy aims to detail the concept and identification of modern slavery, our obligations as a company and aims to implement the framework to ensure that FUJIFILM DMS’ personnel are aware of their responsibilities. FUJIFILM DMS continues to review all existing control measures to ensure that equivalent and sufficient processes are in place, which includes increased consultation with its Philippines operations and vendor managers. During the current reporting period, FUJIFILM DMS did not identify any instances of modern slavery practices within our operations.

Supply Chain

During the current reporting period, although FUJIFILM DMS has not identified any direct evidence of modern slavery practices in our supply chain, we are aware that products and services that we employ in our supply chain have varying level of risks that are at a higher risk of causing, contributing to or being linked to modern slavery practices.

Through undertaking a mapping exercise, studying our supply chains and assessing supply chain risks in relation to modern slavery, FUJIFILM DMS identified and classified the following products and/or services in the relevant sectors in accordance with the following risk categories. They are as follows:

Classification of Likelihood of Modern Slavery Risk for Products and/or Services in FUJIFILM DMS' Supply Chain

Low and Moderate Likelihood of Risk	Higher Likelihood of Risk
<ul style="list-style-type: none"> • Electricity • Financial Services • Furniture Rental • Individual Contractors • Gym/Health and Fitness • Travel Management • Property Services • Consultancy Services • Office Stationery • Telecommunication Services 	<ul style="list-style-type: none"> • Catering • Clothing/textiles (includes uniform suppliers) • Security • IT Suppliers (equipment and services) • Labour Hire and Recruitment • Postal and Courier Services • Stock and printing supplies • Computers and mobile phones • Building management and maintenance (including cleaning, waste disposal, construction and maintenance work) • Machine/ machine maintenance

Classification of Likelihood of Modern Slavery Risk in relation to Geographic Regions where FUJIFILM DMS' Suppliers Have Operations In

Low and Moderate Likelihood of Risk	Higher Likelihood of Risk
<ul style="list-style-type: none"> • Australia • The United Kingdom • New Zealand • Thailand • The United States of America 	<ul style="list-style-type: none"> • Bangladesh • Brazil • China • India • Indonesia • Malaysia • The Philippines • Vietnam • Belarus • United Arab Emirates • Russia

Based on the Modern Slavery Questionnaire responses received from our suppliers, we were able to determine that some of our suppliers have operations in countries including Bangladesh, Brazil, China, India, Indonesia, Malaysia, Philippines, Vietnam, Belarus, UAE and Russia. FUJIFILM DMS has identified that those countries are also countries with higher geographic risk of modern slavery (based on the 2018 Global Slavery Index of Walk Free Foundation). From approximately 173 Australian FUJIFILM DMS suppliers to respond in the current reporting period, about 19 reported having overseas operations in higher risk countries (11%) and 45 reported using suppliers from higher risk countries (26%).

Some of the suppliers mitigated the risk of modern slavery through implementing processes and procedures such as audit mechanisms, implementation of policies to prohibit the use of forced labour and human trafficking in their supply chain, including the supplier code of conduct, supply chain mapping, operations review, and staff training. In the current reporting period, none of our suppliers who responded to our Modern Slavery Questionnaire reported any known modern slavery in their operations.

To improve our understanding of the modern slavery risks in our supply chain, risk assessments of Modern Slavery Questionnaire responses were conducted, taking into account sector and industry risks, geographic risks, product and services risks and entity specific risks. Where our suppliers identified the aforementioned mitigation strategies, their risk rating allocated to them in our analysis was reduced. Approximately 4.6% of FUJIFILM DMS' supply chain consists of higher risk suppliers, 59.6% medium risk suppliers and 36% low risk suppliers.

Figure 1: FUJIFILM DMS Supply Chain composition before considering supplier modern slavery mitigation factors

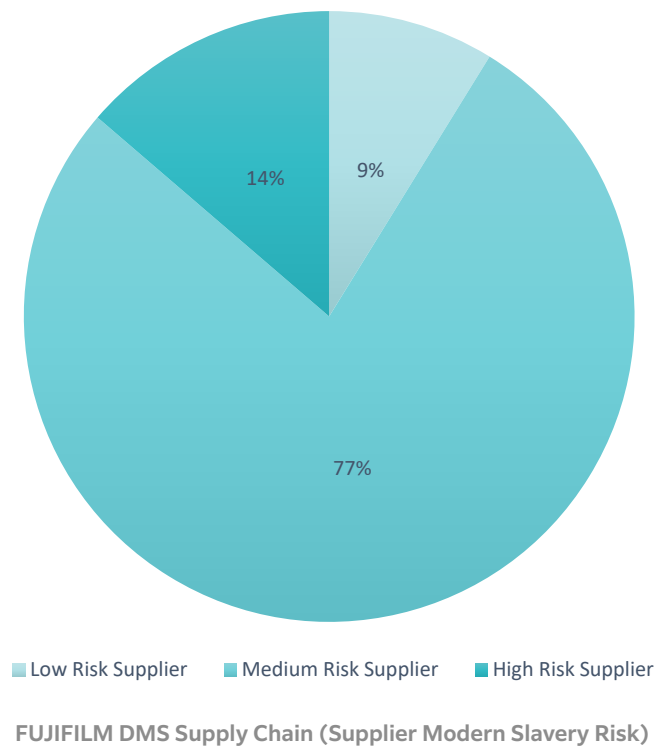
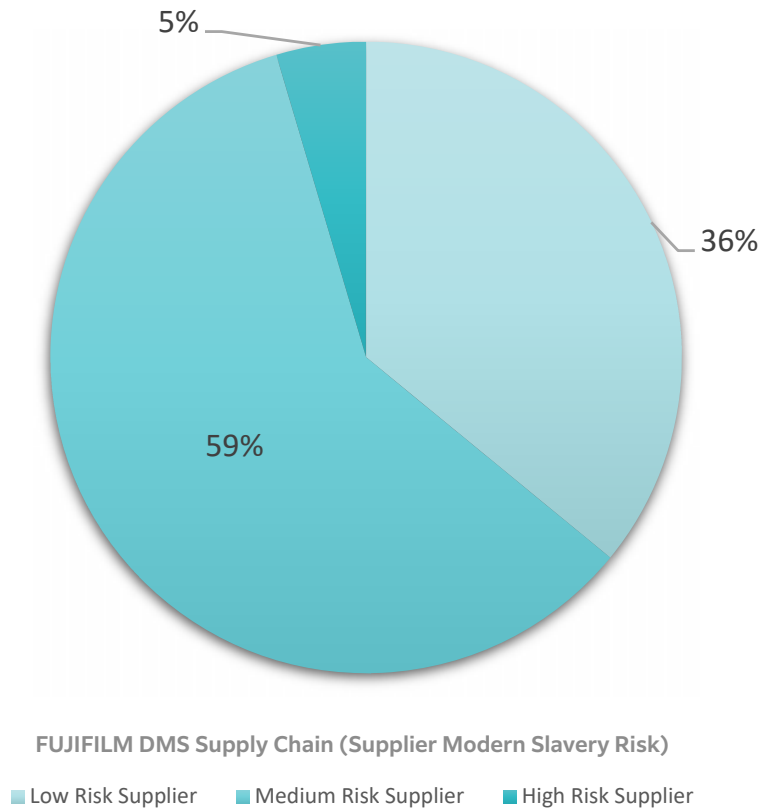


Figure 2: FUJIFILM DMS Supply Chain composition after considering supplier modern slavery mitigation strategies



We acknowledge that the suppliers to FUJIFILM DMS' Philippines operations ("**Philippines suppliers**") have an increased geographic risk of modern slavery practices. Modern Slavery Questionnaires were also sent out to these suppliers. Response rates to the FY2019/2020 Modern Slavery Questionnaires in the Philippines were not as high as the suppliers to FUJIFILM DMS' Australian operations, however continuous and ongoing work with the Philippines vendor managers and suppliers has improved the response rates over the current reporting period.

Throughout the current reporting period, a number of consultation sessions were held with the Philippines vendor managers to ensure that the suppliers were followed up to obtain their responses to the Modern Slavery Questionnaires. In the current reporting period, approximately 57% of the Philippines suppliers responded to the FY2020/2021 Modern Slavery Questionnaire, an improvement of about 10% from the prior year, and of these suppliers who have responded, about 21% are considered higher risk, 68% are medium risk and 11% are low risk suppliers. FUJIFILM DMS does not have visibility over Philippines suppliers that have not responded to its Modern Slavery Questionnaires, hence will continue to make effort to improve the engagement process and response rates of its Philippines suppliers.



Impacts and Risks Of COVID-19

FUJIFILM DMS acknowledges the impact of COVID-19 on its operations and supply chain and understands that COVID-19 may have placed an increased strain on our suppliers which could increase the likelihood of risk of modern slavery practices occurring. A continued effort has been undertaken over the current reporting period to determine the impact of COVID-19 in our operations and supply chain.

Operations

For FUJIFILM DMS' operations, impacts of COVID-19 meant that where possible, working from home measures were implemented for our office employees. However our operational sites in various state locations remained open and operating during the reporting period with the implementation of FUJIFILM DMS COVID Safe Plan during the reporting period, which include application and requirement to practice COVID safe measures at FUJIFILM DMS sites, in line with the relevant state and territory government directives. Hence our employees working at FUJIFILM DMS sites exercised extra precautionary measures and followed government directives and guidelines, to ensure they remained safe and their colleagues remained safe from COVID-19 virus. Our operational site management teams spent additional efforts to ensure each site remained operational and COVID safe, in line with the FUJIFILM COVID Safe Plan and the relevant government directives.

Our Senior Leadership Team remained flexible during this period, to ensure maximum support was provided to our employees, operations and customers, having weekly to multiple daily meetings and where necessary, with the relevant operational site management teams to ensure support, direction and guidance was provided as required, due to the rapidly changing circumstances brought on by the status of the virus spreading in various states and locations.

As a result of COVID-19 impact, FUJIFILM DMS experienced some volume decline in its services to customers, due to deferral and/or cancellations of non-essential projects and services that were due to commence during the reporting period, however was otherwise able to continue providing services to support our customers' operational needs.

Supply Chain

During the current reporting period, FY2019/2020 Modern Slavery Questionnaire was updated to explore impacts of COVID-19 on the suppliers, including whether suppliers were required to alter their supply chains as a result of the impacts of COVID-19.

The responses from suppliers that responded did not indicate any obvious risks and most of our suppliers' supply chains were not significantly impacted or required change. Based on the Modern Slavery Questionnaire responses received during this period, only about 10% of suppliers responded having changed their processes due to COVID-19, with only about 1% reporting changes to their supply chain.



Some noted a reduction in supply volumes from their suppliers, as a result of which FUJIFILM DMS' was impacted with occasionally slower supplier delivery times, whereas other suppliers responded that they utilised additional local suppliers to ensure adverse impacts caused by COVID-19 to their supplier's operations or their workers were reduced.

Some of our suppliers reported a downturn in their trading. However overall, other than those mentioned above, COVID-19 did not impact FUJIFILM DMS' selection of and engagement with vendors and there have been no significant impacts to FUJIFILM DMS' internal operations. Supply chains were not required to be restructured or altered other than occasionally slower supplier delivery times.

Our continuous assessment of COVID-19 impacts has revealed that FUJIFILM DMS' labour hire suppliers faced shortage of labour hire workers being made available, due to the impacts of international travel and border restrictions being imposed by the Australian Government as a result of COVID-19, as a portion of labour hire workers in Australia consisted of international workers and students. Therefore, there was a reduction in the labour pool due to the unavailability of the usual overseas supply for casual work and workers in number of industries. These shortages created some challenges and delay in FUJIFILM DMS' ability to fill vacant roles and additional labour hire suppliers were engaged during this period as a mitigation measure.

FUJIFILM DMS will further explore the COVID-19 impact on our supply chains during the next reporting period.

Actions Taken to Assess and Address Modern Slavery Risks

Assessment

During the current reporting period, FUJIFILM DMS has undertaken risk assessments of its operations and supply chains to assess its susceptibility to modern slavery practices and to evaluate the potential for FUJIFILM DMS to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains. As part of this process, FUJIFILM DMS continued to assess how FUJIFILM DMS' current policies and practices functioned to address the risk of modern slavery in its operations and supply chain.

- **Updating Modern Slavery Questionnaire**

In the last reporting period, FUJIFILM DMS developed a FY2019/2020 Modern Slavery Questionnaire which was sent out to its suppliers that were assessed as higher risk and also those whom contributed to significant part of its supply chain by monetary value, after financial assessment of its suppliers by their spend value had been conducted. The FY2019/2020 Modern Slavery Questionnaire focused on modern slavery risks as provided in the Guidelines in particular by:

- Sector;
- Industry;
- Types of products and services; and
- Geographic risks.

For the current reporting period (period of 1 April 2020 to 30 March 2021), FUJIFILM DMS updated the FY2020/2021 Modern Slavery Questionnaire. A number of questions were modified and new questions inserted to increase visibility of our supply chain.

FUJIFILM DMS will continue to assess the effectiveness of its Modern Slavery Questionnaire to determine what further modifications or improvements may be required to assist with the understanding and assessment of its suppliers of modern slavery risks.

- **Engaging with Suppliers**

FUJIFILM DMS engaged with its suppliers to provide them with Modern Slavery Questionnaires and collaborated with its suppliers to ensure that the responses provided by them were substantive and reflect their organisational practices.

In the current FY2020/2021 reporting period, a total of approximately 388 suppliers were initially identified for the purpose of engagement to respond to the updated FY2020/2021 Modern Slavery Questionnaire for assessment based on the following criteria:

- Supplier by spend: We sought to assess our next top 150 suppliers based on FUJIFILM DMS' financial spend value allowing FUJIFILM DMS to assess suppliers which FUJIFILM DMS has the greatest ability to influence and impact (Note: In the prior reporting period, top 100 suppliers by spend value were identified for the purpose of supplier risk assessment); and
- Higher risk supplier: Suppliers who could be connected to known factors that contribute to a higher risk of modern slavery including raw materials, sector industry risks, where base skills workers and short term temporary contracts are employed (Note: this criteria was also used in the last reporting period in identifying suppliers for the purpose of supplier risk assessment), those not already captured in the prior year's supplier risk assessment.

Of these approximately 388 suppliers identified, about 86 were either no longer part of the FUJIFILM DMS' supply chain or no longer trading. Therefore, the Modern Slavery Questionnaires were sent to the remaining active and current suppliers of FUJIFILM DMS. Also included in the scope of this Statement were a number of active FY2019/2020 FUJIFILM DMS suppliers who provided their questionnaire responses after the first statement period ended.

A process was introduced to capture new FUJIFILM DMS suppliers which were onboarded during the FY2020/2021 reporting period, that did not fall within the scope of above criteria. Those new suppliers identified were also assessed by the FY2021/2021 Modern Slavery Questionnaire, however this area requires further work.

Unfortunately, not all the suppliers targeted to complete the FY2020/2021 Modern Slavery Questionnaire responded in the current reporting period (response rate to the questionnaires sent in FY2020/2021 period was about half, a lower response rate for Australian based suppliers but higher response rate for the Philippines based suppliers in comparison to the prior year). This could be due to number of factors, including impacts of COVID-19 on businesses. FUJIFILM DMS is working with its vendor managers to ensure a higher response rate through continued and active engagement with its suppliers. In order to increase the response rate and engagement with the FY2020/2021 Modern Slavery Questionnaire, a "Frequently Asked Questions" section was inserted, to educate and provide background information to the supplier on what is considered as "modern slavery" under the legislation, FUJIFILM DMS' modern slavery reporting requirements, providing an internet address link to the Australian Government Department of Home Affairs' website to enable the supplier to obtain further information about what modern slavery is as required. This is in order to assist and encourage our suppliers to understand why they are being asked to answer such questionnaires to understand the overall project, and to answer the FY2020/2021 Modern Slavery Questionnaire thoroughly and truthfully. This process assisted the engagement with our suppliers and to obtain more comprehensive responses.

Where we received incomplete responses from our suppliers, or the provision of documents instead of specific responses to questions, at first instance we attempted to assess what was provided to us and to obtain further information from these suppliers as required and where the responses were deemed inadequate, we are reengaging with our supplier to request for completion of the Modern Slavery Questionnaire.

Risk Assessment

FUJIFILM DMS understands that due diligence is an *"ongoing management process to identify, mitigate and account for how an entity addresses actual and potential human rights impacts in their operations and supply chain."*¹ Therefore, FUJIFILM DMS will continue to assess the responses and any supporting documentation it receives from its suppliers, in order to assess and to identify modern slavery risks in its supply chain.

Over the current reporting period, FUJIFILM DMS conducted modern slavery risk assessments of the FY2019/2020 and FY2020/2021 Modern Slavery Questionnaires completed by suppliers to increase understanding of our supply chains, operations and suppliers and to determine any high risk factors that are present.

Responses were collated and a risk assessment was conducted to provide insight and enable FUJIFILM DMS to further engage and consult with those suppliers that remain in the higher risk categories. FUJIFILM DMS seek to follow up and engage with its higher risk suppliers as necessary.

¹ Please see page 47 of the Guidelines located at <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.



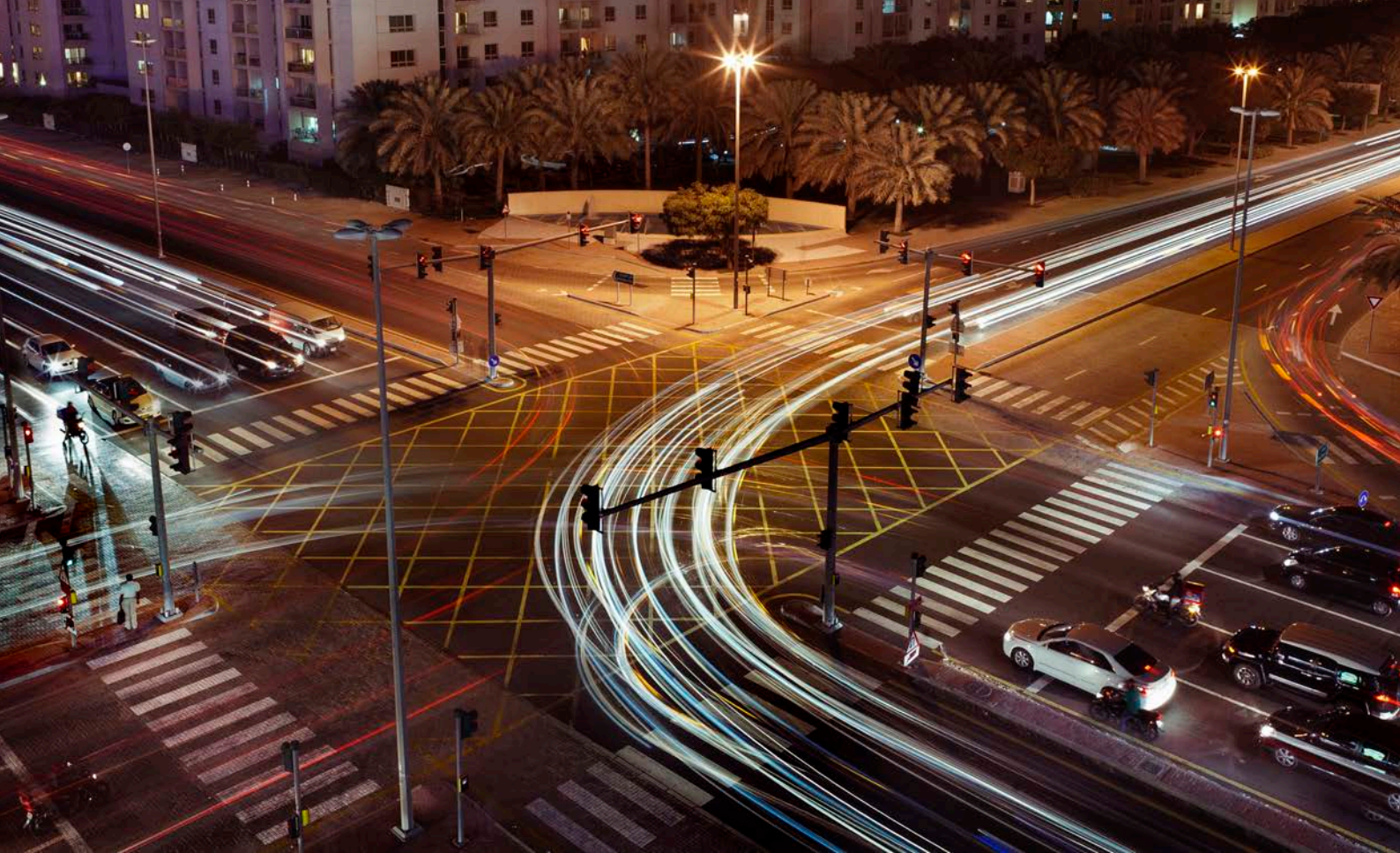
Actions taken to Address

FUJIFILM DMS has a compliance program, which combined with a culture of “doing the right thing” and its commitment to compliance in all respects with the relevant laws, industry and organisational standards and principles of good governance, it acts as an effective measure and foundation to help address and mitigate modern slavery risks in our operations and supply chains.

In order to reduce the risk of modern slavery practices being present in our operations, FUJIFILM DMS maintains stringent processes in on-boarding and managing engagement of employees and staff , to ensure their right to work in the relevant country as well as being subject to satisfactory checks. Reference, criminal history and probity checks are conducted on FUJIFILM DMS employees and labour hire workers, which aims to assist in identifying any risks. These processes and procedures assist in FUJIFILM DMS having control measures in place to mitigate the risks of its employees and staff being the subject of modern slavery, such as the practices of debt bondage.

During the current reporting period:

- The FUJIFILM DMS Modern Slavery Task Force (“**Task Force**”), formed in 2019, continues to drive the modern slavery project and related initiatives (“**Modern Slavery Project**”) with the full support of our Managing Director and the Senior Leadership Team. The Task Force members include the Senior Leadership Team (including the Managing Director), members of the Legal Department, Finance Department and the vendor managers from each business group within FUJIFILM DMS. The members of the Task Force are relied upon to meet FUJIFILM DMS’ modern slavery reporting obligations and to monitor responses from FUJIFILM DMS’ suppliers, as they engage directly with our suppliers, are involved in the day to day management of our operations and are supported by the Legal, Finance and Quality Departments.
- FUJIFILM DMS has added additional dedicated personnel to the Task Force to address modern slavery risks and has dedicated additional time, resources and materials to further expand its compliance program.
- FUJIFILM DMS’ employee training for FUJIFILM’s policies now include a section on “Doing the Right Thing- Whistleblower Policy” (“**Whistleblower Policy**”), which was developed and incorporated during the current reporting period. The Whistleblower Policy acts to allow employees, suppliers and contractors to confidentially and with the option to anonymously raise concerns, including those that may relate to modern slavery or human trafficking in a number of ways, including by email, post or via a Whistleblower Hotline.
- The whistleblowing process under the Whistleblower Policy can be an effective grievance mechanism to those that discover, or are impacted by, modern slavery related issues and risks at FUJIFILM DMS in line with the United Nations Guiding Principles on Business and Human Rights (principles 22 and 31) and can also be an effective form of a remediation process as it is:
 - Legitimate
 - Accessible
 - Predictable
 - Equitable; and
 - Transparent



The Whistleblower Policy and the form for reporting under that policy can be found on FUJIFILM DMS' intranet and are also publicly available on our website. In the current reporting period, we did not identify any instances of modern slavery or human trafficking through the whistleblowing process or any other feedback mechanisms.

- FUJIFILM DMS' supplier agreement template (used for engaging suppliers) includes a dedicated and detailed modern slavery clause, requiring suppliers to take active steps towards ensuring their operations and supply chains are free from modern slavery and to mitigate such risks.
- FUJIFILM DMS' suppliers are also provided with our Supplier Code of Conduct which they are required to acknowledge and agree to comply with. Our Supplier Code of Conduct sets out our commitment and expectations of our suppliers in the areas of Corporate Social Responsibility and Ethical Procurement, including the Environment and Human Rights and Labour issues. FUJIFILM DMS' Supplier Code of Conduct includes a section relating to supplier's commitment towards prevention of modern slavery in its operations and its supply chains. As not all suppliers are engaged on FUJIFILM DMS' terms of agreement, these suppliers are issued with the FUJIFILM DMS Supplier Code of Conduct together with the Modern Slavery Questionnaire, to ensure assessment of modern slavery risks are conducted.
- FUJIFILM DMS' labour hire suppliers are required to enter into FUJIFILM DMS' labour hire services agreements which include a dedicated modern slavery clause, requiring labour hire companies to take active steps towards ensuring their operations and supply chains are free from modern slavery and to mitigate such risks. Our labour hire suppliers are also contractually obliged to comply with all applicable legislative requirements and licencing regimes.
- FUJIFILM DMS developed a Modern Slavery Remediation Process template for circumstances where we may come across issues or risks associated with modern slavery within our operations (for FUJIFILM DMS- an "**Internal**" version) or in our supply chains (a version for "**Suppliers**"). The two processes (Internal and Supplier versions) are different, however both processes have been prepared with the interests of "at risk" individual(s) prioritised. FUJIFILM DMS will review these Remediation Templates against industry standards and update them where necessary to ensure they are ready to deploy should the need ever arise.



- In the current reporting period, FUJIFILM DMS finalised and released its Modern Slavery Policy, effectively setting in place the framework to combat Modern Slavery, outlining our commitment to identify and mitigate the risk of modern slavery in our operations and supply chain, and for the organisation to ensure its responsibilities, processes and procedures are disseminated and understood.
- Modern Slavery training was also developed in conjunction with our Modern Slavery Policy and incorporated into FUJIFILM DMS' policies training. Additional stand alone and detailed Modern Slavery training is currently being developed with further update is to be provided in our next statement.
- FUJIFILM DMS is also in the process of developing targeted training for its vendor managers to ensure they are aware of their responsibilities in relation to the identification and mitigation of risks of modern slavery in our supply chains, and also are aware of our compliance obligations with modern slavery requirements and responsibilities under the *Modern Slavery Act 2018* (Cth) and our commitment to our customers.
- Our legal team members engaged in the Modern Slavery Project and part of the Task Force have also attended legal education sessions in relation to modern slavery identification, analysis and mitigation.
- FUJIFILM DMS has undertaken increased and active consultation with the Philippines vendor managers to assess and address the modern slavery risk in its Philippine operations, including improving the response rate of the Philippines suppliers.
- COVID-19 has increased the risk of modern slavery in parts of FUJIFILM DMS' operations and supply chains as new resources and new suppliers were required. FUJIFILM DMS has addressed and mitigated these new risks by incorporating these new products and/or services and new suppliers as part of its assessment, evaluating any heightened risk, consulting and engaging with the vendor managers and new suppliers and updating existing risk assessments. When engaging with its key suppliers during the reporting period, FUJIFILM DMS has sought to understand and address increased modern slavery risks linked to COVID-19 for workers in its supply chains by incorporating COVID-19 specific questions within its Modern Slavery Questionnaire.
- FUJIFILM DMS will continue to review and refine its existing policies and procedures, enhance its due diligence processes and increase supplier engagement, in order to address the potential modern slavery risks in its own operations and supply chains.

Assessing the Effectiveness of Our Actions

Our continued and ongoing focus will be to review our processes, procedures and to assess the effectiveness of our actions and to update and remediate as required to improve on the existing processes and procedures.

- We continue to hold regular progress meetings to review the status of and progress made in relation to the ongoing Modern Slavery Project and continue to build on this process to strengthen the impact this project has to overall operation of FUJIFILM DMS and supplier engagement and management process. During the review process, if there are identification of areas requiring improvement, existing processes are either modified, replaced and/or new process added to the existing process to try and address the issues. This is an ongoing process, to maximise the effectiveness of the Modern Slavery Project and to continuously make improvements in the areas where it is needed.
- Regular updates in relation to the Modern Slavery Project are provided to the Senior Leadership Team and where necessary, active participation and assistance is requested and expected of the Senior Leadership Team, to ensure the project does not lose focus, momentum and the actions taken are effective. This process has been important this reporting period, due to the impact COVID-19 had on everyone globally, including FUJIFILM DMS, suppliers and customers on their day to day operations. Given the added pressure and additional processes and procedures being introduced to their day to day activities due to COVID-19, it meant there were additional time and work pressure for all. The support process enabled the Modern Slavery Project to continue on and make progress within FUJIFILM DMS during this period.
- Responses from the suppliers in relation to the issues of modern slavery, including the Modern Slavery Questionnaire responses are monitored, tracked and analysed. During the current reporting period, overall, we have seen improvements in supplier engagement, understanding and response rates to the Modern Slavery Questionnaire, particularly in the Philippines. Vendor managers are part of an ongoing effort to increase the supplier response rate. Modern Slavery Questionnaire responses are recorded and tracked and their responses are assessed thereafter. Where necessary, follow-up communication and requests are sent to the relevant supplier. This process shows a level of trend across FUJIFILM DMS' suppliers that potentially relate to modern slavery related risks and assists FUJIFILM DMS to plan and to implement updates and improvement procedures and processes as required.
- Continuation of review of existing policies, procedure and practices to ensure it aligns with the recommended practices relating to mitigating modern slavery risks whether in its operations or supply chains. During this process where there were areas identified as requiring an update and/or improvement, we implemented or are working towards implementing these. Similarly, we will continue to engage with our suppliers and encourage them to engage with their suppliers in relation to their modern slavery policies, procedures and practices to improve and update them. This will improve FUJIFILM DMS' visibility over its suppliers and their suppliers.
- Audit of FUJIFILM DMS' internal processes and procedures against existing policy framework relating to supplier engagements and relationships. During this process where there were areas identified requiring an update and/or improvement, we are working towards implementing these.



- In the next reporting period, FUJIFILM DMS intends to introduce processes to evaluate publicly available resources and implement media monitoring on its suppliers to assist in determining if any suppliers have been previously reported as non-compliant with human rights and labour standards by watchdogs, NGOs and media outlets.
- FUJIFILM DMS will continue to refine its risk assessment methodology in categorising its suppliers into low, medium and higher risk sectors and geographic regions.
- FUJIFILM DMS will continue to review and assess the effectiveness of its modern slavery compliance program and where necessary, develop action plan with short and long term targets to expand on current methods of assessment, due diligence and remediation and to improve on its response to modern slavery risks in the upcoming and following reporting periods.
- FUJIFILM DMS will continue to evaluate the effectiveness of its compliance program by attending relevant modern slavery virtual webinars and/or workshops to identify efforts and measures conducted by its business peers and to address modern slavery risks within their organisations and FUJIFILM DMS will assess and where necessary implement similar measures to improve its compliance program.

Consultation

FUJIFILM DMS entities have shared management teams, corporate functions, policies and processes, hence a joint statement has been prepared, in consultation with the reporting entities, controlled subsidiaries and the Task Force with representations from each business group. Prior to this Statement being put to the Board for review and approval, the Statement was reviewed by the Senior Leadership Team, who are responsible for the management of FUJIFILM DMS.



Future Commitments

Although this reporting year has been a challenging period for all due to the impact of COVID-19, our commitment to this project remains and continues on. At FUJIFILM DMS, we remain committed to the continuous review of our plans, policies, processes, procedures and activities, where necessary making updates in areas identified as requiring improvements and/or updates, following up and tracking progress of any areas identified as areas of risk or potential risk. FUJIFILM DMS see this as key to the successful outcome of this Modern Slavery Project, which will be an ongoing and an important part of our business.

We will continue to work with our employees and our suppliers, with the full support of our board, the Managing Director, the Senior Leadership Team and vendor managers, to raise awareness and understanding about modern slavery and to ensure the success of this long term project of preventing and eradicating modern slavery in Australia and globally.