

FUJIFILM Data Management Solutions

Modern Slavery Statement 2023

FUJIFILM



From our Managing Director

FUJIFILM Data Management Solutions Pty Ltd's and FUJIFILM Data Management Solutions Australia Pty Ltd present our fourth joint Modern Slavery Statement ("**Statement**") under the *Modern Slavery Act 2018* (Cth) ("**Modern Slavery Act**"). Modern Slavery is a serious and prevalent problem in the global economy and we recognise that each of us have to play a part in resolving this complex global problem.

We are committed to preventing, identifying and addressing modern slavery concerns within our business operation and supply chain, continuously improving and enhancing our efforts by reviewing and addressing potential gaps in our internal processes of managing the modern slavery risks. We continue to strive to improve our commitment in raising and maintaining awareness about all forms of modern slavery by proactively engaging with our employees, suppliers and business partners to identify and manage modern slavery risks and instil respect for human rights.

This statement sets out our ongoing actions and assessments undertaken by us, in conjunction with our employees and suppliers, to prevent and eradicate modern slavery and modern slavery risks in our business operations and supply chains both within Australia and internationally.

Approvals

Principal Governing Body Approval

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 2022 to 31 March 2023. This Statement was approved at the board meeting held on 14 July 2023.

Signature of Responsible Member

This Statement is signed by a responsible member of FUJIFILM Data Management Solutions Pty Ltd on behalf of all the named reporting entities as defined by the Modern Slavery Act.

Keith Grieves

Responsible Member

Managing Director of FUJIFILM Data Management Solutions Pty Ltd

Mandatory Criteria

This Statement reflects the planning, progress and actions undertaken by Fujifilm DMS to meet the requirements of the Modern Slavery Act and the mandatory criteria and guidelines for modern slavery statements.

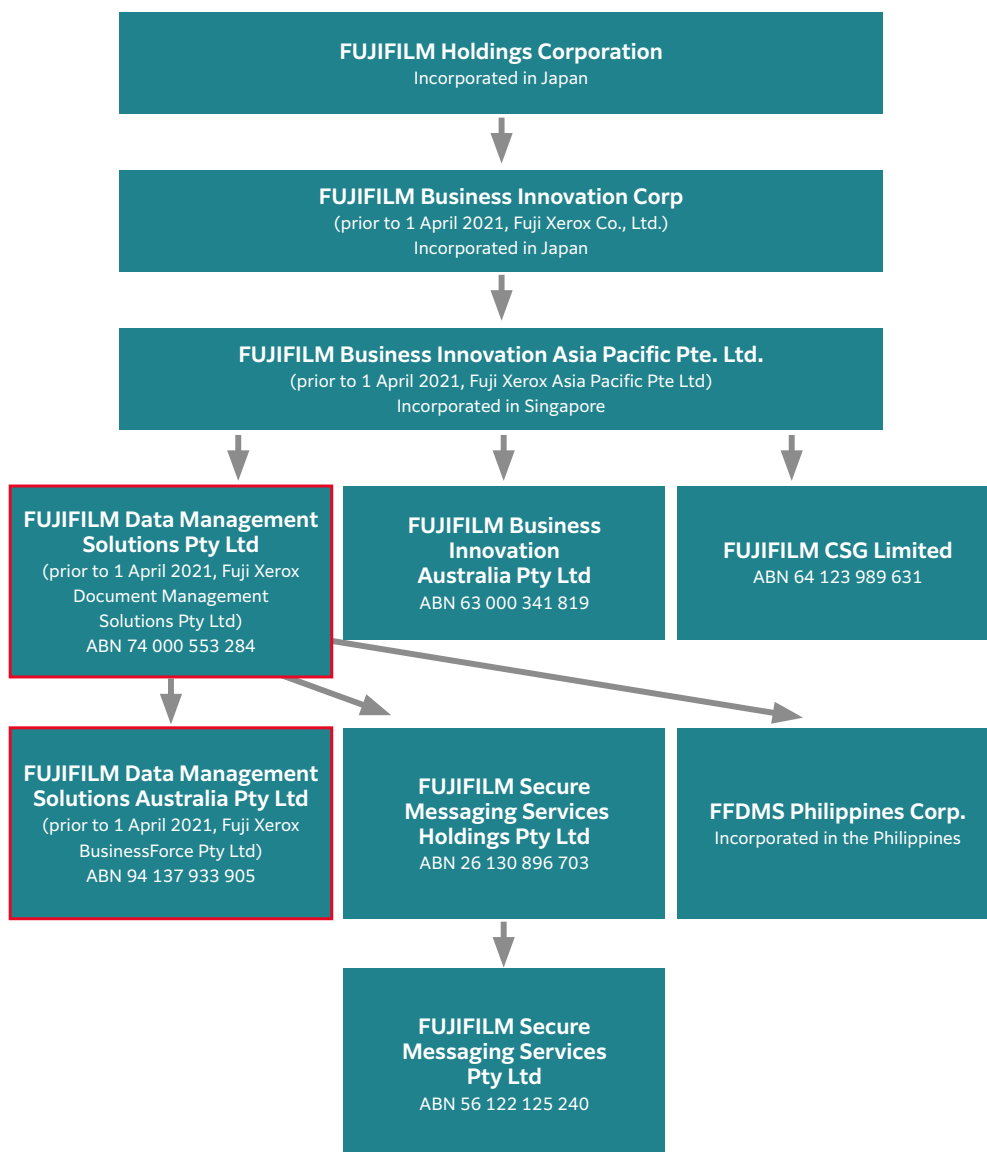
Mandatory criteria	Page number/s
Section a) Identify the reporting entity.	4
Section b) Describe the reporting entity's structure, operations and supply chains.	4 - 9
Section c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	10 - 16
Section d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	17 - 23
Section e) Describe how the reporting entity assesses the effectiveness of these actions.	24
Section f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	25
Section g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Case Studies: 10 - 12 COVID-19 Impacts: 16

Reporting Entities and Reporting Period

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. This Statement is the fourth 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 beginning 1 April 2022 and ending on 31 March 2023 (referred to as the “**reporting period**” in this Statement), prepared in accordance with the Modern Slavery Act. In this Statement, references to “**Modern Slavery**” refers to Modern Slavery as defined under the Modern Slavery Act.

Group 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.

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. Fujifilm DMS' ultimate holding company, FUJIFILM Holdings Corporation, published the FUJIFILM Group Human Rights Statement in June 2018 (revised in April 2019), which is applicable to all personnel within the FUJIFILM Group.

At the end of this reporting period, FUJIFILM Data Management Solutions had the following subsidiary entities within its corporate group in Australia; FUJIFILM Data Management Solutions Australia Pty Ltd, FUJIFILM Secure Messaging Services Holdings Pty Ltd and FUJIFILM Secure Messaging Services Pty Ltd. It also has a subsidiary entity in the Philippines, FFDMS Philippines Corp. ("**DMSP**") which operates as a services entity and provides IT support services to Fujifilm DMS.

During the reporting period, HPAL Ltd and Hermes Precisa Pty Ltd, previous subsidiaries of FUJIFILM Data Management Solutions, have been deregistered. Furthermore, FUJIFILM Data Management Solutions acquired FUJIFILM Secure Messaging Services Holdings Pty Ltd, which in turn wholly owns FUJIFILM Secure Messaging Services Pty Ltd ("**FBSMS**"). FBSMS provides business SMS gateway services.

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 has been prepared for this reporting period.

FUJIFILM Business Innovation Australia Pty Ltd and FUJIFILM CSG Limited are sister companies of FUJIFILM Data Management Solutions, and share the same holding entity, FUJIFILM Business Innovation Asia Pacific Pte. Ltd., as well as the same ultimate parent entity of FUJIFILM Holdings Corporation and together, form part of the FUJIFILM Group.

However, these two sister companies 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, their local management teams and the risks relating to these entities differ to that of Fujifilm DMS. Therefore, Fujifilm DMS has prepared a separate statement to these entities.



FUJIFILM Corporate Group Values, Vision and Mission

All companies within the FUJIFILM Corporate Group of entities (“FUJIFILM Group”) comply with the following:

- FUJIFILM Group Charter for Corporate Behaviour (“**Group Charter**”);
- FUJIFILM Group Code of Conduct (“**Group Code**”); and
- FUJIFILM Group Human Rights Statement (“**Human Rights Statement**”).

The Group Charter, Group Code, and Human Rights Statement together set out the FUJIFILM Group’s respect of human rights based on international declarations such as the United Nations’ Guiding Principles on Business and Human Rights, International Bill of Human Rights, the International Labour Organization’s Core Labour Standards, the Ten Principles of the United Nations Global Compact, and other standards. They aim to prohibit discrimination, forced and child labour and promote the importance of work-life balance, occupational health and safety and the importance of labour rights in the activities of the FUJIFILM Group entities.

Human Rights Statement

The Human Rights Statement operates in conjunction with the Group Charter and Code of Conduct to set out FUJIFILM Group’s basic principles on respect for human rights. These principles include:

1. Recognising the importance of respect for human rights in all activities;
2. Embracing the United Nations Guiding Principles on Business and Human Rights as a framework for implementation of respecting human rights;
3. Working to diligently remedy any adverse impacts on human rights caused or contributed by any business activities;
4. Complying with domestic laws and regulations of each of the localities FUJIFILM Group engages business activities in;
5. Regularly disclosing information on the status of the measures for respecting human rights through FUJIFILM Group website and other means;
6. Engaging in ongoing dialogue with external stakeholders in relation to the measures for respecting human rights.

The Human Rights Statement also makes specific regard for the employment and conditions of employment of employees and contains consideration to that effect, demonstrating the commitment across the FUJIFILM Group to ensure that employment within the group is safe, fair and equitable.

The Group Charter, Group Code and Human Rights Statement apply to all FUJIFILM Group employees and business partners and are publicly available. Both the Group Charter and the Group Code have also been published in 24 languages.

Sustainable Value Plan 2030

In addition to the above, the FUJIFILM Group is underway in implementing its Sustainable Value Plan 2030 which seeks to resolve social issues through business activities which will promote sustainability in a number of key areas including governance, supply chain, work style, daily life, environment and health.

In particular, part of the Corporate Social Responsibility (CSR) objectives of the Sustainable Value Plan 2030 is to promote sustainable procurement that considers factors such as the environment, ethics and human rights. FUJIFILM Group aims to achieve through collaboration with the suppliers and partners to build a sounder supply chain that will strengthen the existing CSR foundations and its processes within the FUJIFILM Group.



Fujifilm DMS Operations

Fujifilm DMS has been operating in Australia for over 35 years, providing its clients with multi-channel communications and services, including large-scale document and data management and communication solutions in print, digital and online.

Fujifilm DMS has operations in Australia (with a presence in states and territories across Australia) and the Philippines. DMSP in the Philippines provides an integral back-office Information Technology/Technology and Professional Services (“TaPs”) support function for Fujifilm DMS’ operations. Fujifilm DMS also has an Asia Pacific outreach, by partnering with other FUJIFILM Group entities in the region.

Fujifilm DMS has been operating in Australia for over 35 years, providing its clients with the following services:



Multi-channel
communications
and services



Large-scale
document and
data management



Print
communication
solutions



Digital online
communication
solutions

At the end of this reporting period, Fujifilm DMS had approximately 864 employees across 9 sites in Australia including offices and operations sites and it has approximately 142 employees located at its Manila, Philippines offices. FBSMS had approximately 7 employees in Australia. Fujifilm DMS’ business divisions consist of a number of different departments being: TaPS, Finance, Legal, Sales and Marketing along with each state’s own Operations, Quality and Human Resources.



864

Employees
across 9 sites



142

Employees
located in Manila

Fujifilm DMS Supply Chain

Fujifilm DMS utilises a variety of goods and services within its immediate supply chain. This includes:

- services ranging from professional and consulting services for tax, auditing, legal, IT and cybersecurity to on-site services such as cleaning, maintenance and repair work;
- goods ranging from goods associated with print operations such as paper, ink and other print supplies and extending to goods used more widely outside of print operations areas such as software, mobile devices, desktop computers, peripherals, office stationery and office consumables.

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

The majority of Fujifilm DMS' direct suppliers are small to medium businesses domiciled in Australia and registered as proprietary limited companies with registered offices in Australia. However, following an analysis of Fujifilm DMS' Suppliers based on the responses from the Modern Slavery Questionnaire disseminated to suppliers for completion, Fujifilm DMS has identified a number of goods and service that are sourced or originate from outside of Australia by the direct suppliers as identified in the map below. For this reporting period, Fujifilm DMS conducted further supply chain mapping with an aim to gain more visibility by mapping its Tier 1 and Tier 2 and beyond suppliers based on the risk assessments of the suppliers including but not limited to the responses received from the Modern Slavery Questionnaire, review of the suppliers' Modern Slavery Statements and Media Monitoring exercises.

The map below provides a general indication of the risks associated with certain goods and services that has been determined based on an analysis of the geographic origins, the industry or sector associated with the goods or services, the raw materials and extended supply chain risks traditionally associated with the goods or services which will be discussed further in this Statement:

Supply Chain Map 2022-2023 - Fujifilm DMS suppliers



— Tier 1 — Tier 2 and Beyond

During this reporting period, FBSMS engaged a small number of suppliers who are predominantly based in Australia. The majority of FBSMS' direct suppliers are large telecommunications providers providing carrier services to FBSMS. Furthermore, given the nature of the industry FBSMS operates in, FBSMS interconnects with international SMS aggregator partners providing SMS transit services, where the relationship is reciprocal. Most of DMS's suppliers are based overseas due to its operations in the Philippines.



Area of Vulnerability: Raw Materials and Case Studies

During this reporting period, it was observed that approximately 18.1% of the suppliers who responded to Fujifilm DMS' Modern Slavery Questionnaire have reported to be using raw materials in the delivery of their services or provision of goods, including metal, paper and timber, ink, plastic and rubber, building materials, chemicals. Out of the reported raw materials, Fujifilm DMS conducted risk assessment and due diligence via a case study of the paper suppliers and associated raw materials as paper is found to be not only prevalently used by the suppliers but is also one of the key materials sourced by Fujifilm DMS directly for the provision of printing services to our clients. Fujifilm DMS has also witnessed an overall shortage in the supply of paper due to the lack of supply of raw materials such as timber and pulpwood across Australia which has in turn impacted Fujifilm DMS' procurement of paper. The case study of the paper suppliers and its industry shed light on and assisted with our overall risk assessment of Modern Slavery in our supply chain.



who responded to Fujifilm DMS' Modern Slavery Questionnaire in this reporting period have reported using raw materials in the delivery of their services or provision of their goods including:



Metal



Paper & Timber



ink



Plastic & Rubber



Building Materials



Chemicals

Case Study: Paper suppliers and associated raw materials

Global Trends on Paper, Forestry and Timber Trade

According to the Global Slavery Index (2018), timber is identified as one of the top five products at risk of Modern Slavery in each of the G20 countries. Statistics derived in a Thomson Reuters Foundation study indicate that illegal logging contribute between 15% to 30% of the global timber trade which underpins the manufacturing and processing of paper products, and up to 50% of illegal logging globally is dependent on forced labour.

Due to the elevated risks of Modern Slavery in the timber and paper industry, Fujifilm DMS has dedicated a special working group to research, conduct due diligence, risk assess and analyse any potential risks of Modern Slavery within the operations and supply chain of new direct and indirect suppliers of paper engaged during this reporting period, whether they are compliant with domestic labour regulations in the country they operate in, as well as the commitment they have shown to work with their own suppliers to identify and address any Modern Slavery risks within their operations and extended supply chain. In continuation from the previous reporting period, the working group thus presents its findings and results by way of this case study.

Due Diligence and Risk Assessment

During this reporting period, Fujifilm DMS' special working group conducted due diligence on the new suppliers, including the analysis of:

1. more broadly, the legal and regulatory landscape of the countries where the suppliers mainly operate in; in order to understand the legal requirements around risk assessment and reporting obligations for Modern Slavery risks;
2. the operations of the suppliers including the size, the core business and operations, subsidiaries (if any), and any underlying operational risks of Modern Slavery;
3. the suppliers' supply chain including their direct suppliers (Tier 1), and indirect suppliers (Tier 2 and beyond), and supply chain risks of Modern Slavery;
4. any commitment shown by the suppliers in combating and eradicating Modern Slavery within its operations and supply chain;
5. any Modern Slavery risk management strategies including risks analysis and due diligence on its operations and supply chain; and
6. any risk mitigation and preventative measures adopted, relevant complaint procedures implemented, and any remedial actions taken.

Fujifilm DMS proactively collected and analysed information that was provided by the suppliers by answering the Fujifilm DMS' Modern Slavery Questionnaire, as well as publicly available information on the internet, including policies, code of conducts, endorsements, acknowledgements, Modern Slavery Statements (if relevant and published) and their equivalents in other jurisdictions.

Supplier analysis

Regulatory Landscape: The new direct and indirect paper suppliers had operations in countries with relatively lower prevalence on the Global Slavery Index (2023) such as Australia, Germany and South Korea. In January 2023, Germany enacted an Act that is similar to the Australian Modern Slavery Act, called Lieferkettengesetz or the 'Supply Chain Due Diligence Act' (the "**German Act**") which requires companies

with over 3000 employees operating in Germany (including foreign companies with German branches) to establish a risk management system for its own operations and direct suppliers, appoint a human rights officer, conduct annual analysis on its own operations and direct suppliers (including further analysis for areas with increased risks), issue a human rights policy statement, take preventative measures and remedial actions without undue delay, establish a complaints system, extend due diligence exercises to its indirect suppliers, and submit an annual report which will be made publicly available.

Even though South Korea does not have an equivalent Modern Slavery legislation, there are relevant legislations in South Korea which contribute to the protection against Modern Slavery including minimum working standards and conditions set by the South Korean Labour Standards Act, the Work-Life Balance Act as well as the criminalisation of Modern Slavery practices in general. Additionally, South Korea's Human Trafficking Prevention Act prohibits the recruitment, transportation, transfer, harbouring or receipt of people by coercion, fraud or other means for the purpose of exploitation.

Combating Modern Slavery and Human Rights Risks

Fujifilm DMS's due diligence of the suppliers discovered that the paper suppliers engaged in this reporting period had various mechanisms to combat Modern Slavery and human rights risks. Most suppliers had established policies, codes and standards such as Ethical Management Policy, Whistle-blower Mechanism, Supplier and Third-Party Code and internal policies and code of conduct to manage Modern Slavery risks both within its operations and its supply chain. As part of operation risk management, one of the suppliers maintains a Code of Conduct which prohibits Modern Slavery, and recognises and actively promotes the Ten Principles of the United Nations Global Compact relating to human rights, labour, environment, and anti-corruption, and work to ensure that human rights are respected within its operations and business relationships in line with United Nations Guiding Principles on Business and Human Rights. To actively manage supply chain risks, the supplier maintains a global tracing system integrated into third party ISO 9001 and ISO 14001 certified management systems where supply chain could be traceable and held accountable.

As part of preventative and risk mitigation measure, some suppliers provide training to the employees, addressing the protection of human rights and identifying risks associated to Modern Slavery. Additional e-learning modules are also provided to its employees who interact with suppliers (i.e. vendor managers). Furthermore, some suppliers adopted automated risk-screening of all existing suppliers to identify any risks and to seek remediation, where necessary and some suppliers reported that they conduct regular audits, including on-site audits and assessments as a means to verify a supplier's compliance with the relevant legal requirements.

Looking Forward...

Fujifilm DMS will continue to engage with its paper suppliers to identify any Modern Slavery risks within its supply chain and continue the due diligence efforts on their direct and indirect suppliers (Tier 2 and beyond) to further analyse their extended supply chains to identify and mitigate any Modern Slavery risks.

Risks

Analysis of Potential Risks of Modern Slavery Practices in both Operations and Supply Chains

During this reporting period, Fujifilm DMS has continued to further consider, assess, and improve on its processes around Modern Slavery risks and identify any conditions that may inadvertently contribute to its proliferation in Fujifilm DMS' operations and supply chains. In its risk assessment process, Fujifilm DMS has based its own risk indicators off Appendix 1 Table 6 set out in the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (Guidelines) namely sector and industry risk, geographic risk, product and services risk as well as entity risks. Fujifilm DMS did not identify any instances of Modern Slavery practices within its supply chain and all of the suppliers who responded to its Modern Slavery Questionnaire confirmed that they had not detected any instances or suspected instances of Modern Slavery in their own supply chains during this reporting period.

Potential Risks of Modern Slavery Practices in Supply Chain

Fujifilm DMS has continued to map out its supply chains and assess its supply chain Modern Slavery risks. Following from last reporting period, Fujifilm DMS has continued to identify and classify products and services that it utilises in accordance with certain risk categories as follows:

Lower Likelihood of Risk	Moderate Likelihood of Risk	Higher Likelihood of Risk
<ul style="list-style-type: none"> Financial Services Individual Contractors Gym/Health and Fitness Healthcare and Wellness Services Travel Management / Accommodation Consultancy Services Telecommunication Services Insurance Professional Services 	<ul style="list-style-type: none"> Power / Electricity Furniture and Equipment Rental Office Stationery 	<ul style="list-style-type: none"> Catering Clothing/textiles (includes uniform suppliers) Security & Protection Services IT Suppliers (equipment and services) Labour Hire and Recruitment Postal, Courier and Logistics Stock and printing supplies Computers and mobile phones Building management, Maintenance and Property Services (including cleaning, waste disposal, construction and maintenance work) Machine/Machine Maintenance Manufacturing Wholesale and Trade

Fujifilm DMS also undertook an analysis of its top suppliers based on spend and its top suppliers were in the areas of print suppliers (includes paper, machinery, equipment, envelopes, stationery and ink suppliers), labour hire recruitment, IT consulting and property leasing, with the vast majority of these being based in and operating in Australia with several suppliers based in New Zealand, Canada, Japan, and Germany. Additionally, it has been identified that its top 10 spend suppliers are based in Australia.

Similarly, Fujifilm DMS has continued to map out its supply chain's geographical links as a means of determining associated Modern Slavery risks.

During this reporting period, analysis was also conducted to gain visibility on suppliers who have operations in other countries. Fujifilm DMS examined the prevalence of Modern Slavery ranking that has been attributed to each of the countries in the Global Slavery Index Report 2023 which is a ranking out of 160 countries, with the higher the ranking meaning the lower the prevalence of Modern Slavery.

The following sets out the countries that Fujifilm DMS' direct suppliers are located in besides Australia (where majority of Fujifilm DMS suppliers are located) and their Modern Slavery ranking (in the order of lowest risk to highest risk):

- Switzerland (160/160)
- Netherlands (157/160)
- Germany (156/160)
- Belgium (154/160)
- Japan (153/160)
- Ireland (152/160)
- New Zealand (149/160)
- Australia (147/160)
- United Kingdom (145/160)
- Canada (144/160)
- Singapore (139/160)
- United States (123/160)
- Estonia (107/160)
- Malaysia (72/160)
- India (34/160)

In many transactions for this reporting period, the suppliers that Fujifilm DMS contracted with were generally the Australian registered entities of a multinational group headquartered in the US, Japan or another country with a high index ranking.

The position with FBSMS is somewhat similar to that of Fujifilm DMS', whereby, the large international corporations engaged by FBSMS are usually the Australian registered entities of an International Company. Majority of FBSMS' suppliers are based in Australia therefore also reducing country-specific Modern Slavery risks.

As for DMSP, as its operation is based in the Philippines, the majority of its suppliers are from the Philippines. With the Philippines being ranked 30th for prevalence on the Global Slavery Index Report 2018, the direct suppliers of DMSP may be exposed to higher inherent risks of Modern Slavery due to the country in which they operate in. Therefore, rigorous media monitoring exercises were conducted for the top 10 highest spend direct suppliers to assess its risks of Modern Slavery. Based on these exercises, no adverse results were found relating to Modern Slavery and none of the high spend suppliers are headquartered in the top 10 countries that are considered as having highest inherent risks in Modern Slavery practices (Global Slavery Index Report 2018) as they are mainly headquartered in the Philippines.

Potential Risks of Modern Slavery Practices in Operations

Fujifilm DMS has engaged with its labour hire agencies and undertaken due diligence to ensure that they have robust systems and processes in place to ensure that their workers are not exploited and are adequately educated on their rights and entitlements. The agencies whom Fujifilm DMS engaged had several measures to combat risks involving migrant workers or visa holders. One such measure taken was to conduct additional and periodic checks to ensure that proper working rights and visa status were maintained during a labour hire worker's employment with a given agency and initial screening and verification carried out by the agency as to their visa and work status for all workers. Some suppliers had policies or frameworks which outlined their efforts towards mitigating Modern Slavery risks in various areas such as advertisement, shortlisting and onboarding processes and procedures. Some of these policies of the suppliers also include audits or reviews conducted on its own operations and suppliers to identify and assess risks of Modern Slavery. Some suppliers also indicated that their supplier contracts contained clauses to ensure that the services are rendered and the products are sourced in compliance with the applicable laws.

Fujifilm DMS continues to ensure that it maintains stringent standards amongst its labour hire suppliers and it has taken measures to include clauses in its standard labour hire services agreements whereby labour hire suppliers are required:

- To take all reasonable steps and due diligence to ensure there is no Modern Slavery in its own operations or supply chains;
- Make reasonable enquiries and conduct due diligence to ensure its personnel and suppliers are not and continue to not be the subject of any enquiry, investigation or enforcement action for offences or alleged offences in relation to Modern Slavery;
- To maintain records evidencing steps taken to ensure compliance with the above; and
- Notify Fujifilm DMS as soon as they become aware of any information to the contrary on the above.

At the end of this reporting period, Fujifilm DMS had approximately 35 temporary workers throughout Australia. Fujifilm DMS intends to continue to closely monitor and work with its labour hire suppliers to ensure that the risks of Modern Slavery are mitigated and to undertake further study and due diligence around the temporary labour market.

Review to Identify Operational Risks During Reporting Period

Fujifilm DMS conducted a further annual review to ascertain the risk of Modern Slavery within its own operations by examining its operations and liaising between business divisions to determine any change in risks from the previous reporting period. It was found that recruitment practices around the use of labour hire agencies continue to be a potential area of risk along with the presence of its operations in the Philippines. However, compared to the last reporting period, the risks have decreased due to reduced needs for labour hire workers during this reporting period. The review results indicated that there are a substantive number of measures in place to reduce the risks posed by the use of labour hire such as induction for temporary staff, contractual requirements around remuneration and payment of workers at award rates set out in its labour hire agreements and also requiring labour hire agencies to meet legal requirements under applicable local labour laws through contracts and Fujifilm DMS' Supplier Code of Conduct .

During this reporting period, Fujifilm DMS also conducted review on the potential risks of Modern Slavery within the operations of FBSMS by examining its operations and liaising with the relevant business divisions to determine potential risks, the nature of those identified risks and existing control measures from the completion of the acquisition. Due to the size and nature of FBSMS' operations, it was found that the overall risk levels are relatively low. As FBSMS is currently undergoing post-acquisition activities, Fujifilm DMS placed heavy emphasis on implementing and integrating its Modern Slavery related processes, procedures and control measures within FBSMS' operations to ensure risk mitigation and compliance.



Impacts and Risks Of COVID-19

During this reporting period, COVID-19 continued to impact Fujifilm DMS' and its suppliers' operations and supply chain although the consequence of such impact has lessened compared to the last reporting period due to the easing of the Government restrictions. Fujifilm DMS has conducted an assessment of the ongoing impacts caused by COVID-19 to its operations and supply chains, which is as follows:

COVID-19 Risks on Operations

Fujifilm DMS' first priority continues to be the health and safety of its employees, clients and customers and always seeks to take proactive measures to ensure this is prioritised. Within Fujifilm DMS' operations, the continued presence and impacts of COVID-19 meant that where possible, working from home measures have continued to be implemented for office employees in order to limit contact and reduce the risks of infection. However, this gradually eased towards the end of 2022, with office employees adopting hybrid method of working, mixing working from the office and from their home.

For Fujifilm DMS' operational sites in various Australian states and territories, these sites remained open and operational during this reporting period, subject to stringent measures implemented at each of our premises in all jurisdictions. This is in accordance with the Fujifilm DMS' COVID-19 National Management Plan which is inclusive of the relevant states' and territories' COVID Safe Plans (where applicable) and is ultimately in line with the relevant state and territory government directives and applicable Work Health and Safety (WHS) obligations. Fujifilm DMS performs regular review of this plan to ensure that the measures and strategies adopted and implemented across our sites meet the requirements under the latest rules published by each of the relevant states and territories.

Pursuant to this COVID-19 National Management Plan, all employees, contractors as well as visitors are requested to exercise precaution and abide by the risk control measures for each site and follow government directives and guidelines, to ensure the risk of COVID-19 transmission is managed at each site.

Fujifilm DMS' operational site management teams also conducted risk assessments to assess the adequacy and suitability of risk controls implemented at each site to ensure that they are compliant, effective and ultimately COVID safe. The Senior Leadership Team ("SLT") continued to provide maximum support to Fujifilm DMS' employees, operations and customers by having regular consultations with the relevant site management teams to ensure support, direction and guidance were adequately and effectively provided as required, due to the rapidly changing circumstances and changes to health directives.

COVID-19 Risks on Supply Chain

Based on the Modern Slavery Questionnaire responses received from Fujifilm DMS suppliers, only approximately 10% of suppliers responded that they have changed their processes due to COVID-19. Suppliers were queried on whether they had been affected by the COVID-19 pandemic and the magnitude of these effects on their operations and supply chain from Modern Slavery perspective. Fujifilm DMS' suppliers reported that there was generally no supply chain impact and that their own operations measures were undertaken in line with government health directions and precautions put in place to ensure a safe working environment. Some suppliers responded they had to modify their logistics and freight processes, however as a general observation, most suppliers have already adapted to the circumstances of the ongoing pandemic and were minimally impacted.

COVID-19 Risks in Labour Hire

During this reporting period, due to the ongoing labour shortage in the job market caused by the prolonged impacts of COVID-19, the availability of labour hire workers through labour hire agencies as well as recruitment in general within Australia have continued to be impacted. This trend has continued from the previous reporting periods and has affected Fujifilm DMS as this coincides with a number of Fujifilm DMS projects requiring the use of labour hire workers.

Actions taken to Assess and Address Modern Slavery Risks

Action: Reviewing and updating the Modern Slavery Policy

During this reporting period, Fujifilm DMS reviewed and updated its Modern Slavery Policy to include reference to the Group Charter and the Group Code, tightened our supply chain and operations compliance processes, and improved our existing remediation and investigation process of actual or suspected Modern Slavery occurrence within our supply chain. The policy applies to each person working in Fujifilm DMS' operations and endeavours to cover every aspect of Fujifilm DMS supply chain.

The updated Modern Slavery Policy also applies to all subsidiaries of Fujifilm DMS including DMSP and FBSMS. A copy of the policy was issued to all vendor managers of FBSMS and DMSP which can also be found in the Fujifilm DMS staff intranet.

Fujifilm DMS will continue its efforts in conducting regular review and improvement to its Modern Slavery Policy to ensure it is up to date with the relevant legal obligations, as well as any adjustments to its internal processes.

Action: Onboarding a third-party risk assessment platform

During this reporting period, Fujifilm DMS undertook proactive steps to engage a third-party risk assessment platform to automate the supplier onboarding, risk assessment, due diligence and issuing of Modern Slavery Questionnaire processes. This third-party platform will be onboarded in the new reporting period whereby Fujifilm DMS will enter into a transition period of designing and implementing an automated process of issuing Modern Slavery Questionnaires to its suppliers, conducting risk assessment, due diligence and media monitoring.

In line with this implementation, Fujifilm DMS will conduct a further review of its Modern Slavery Policy to incorporate any necessary adjustments to its existing compliance procedures. We endeavour to provide an information session to relevant personnel to provide training for the adjustments to be made to the existing Modern Slavery compliance procedures.



With the integration of the third-party platform, Fujifilm DMS will continue to review and improve its processes and procedures to best incorporate the features and tools of the third-party software into its existing processes in order to achieve the best possible outcome. We also aim to review the effectiveness of the third-party software annually in managing the Modern Slavery risks in our operations and supply chain.

Action: Reducing Operational Modern Slavery Risks in Fujifilm DMS' Operations

The Fujifilm DMS Modern Slavery Task Force (“**Task Force**”) was formed in 2019 and continues to drive the Fujifilm DMS' Modern Slavery project and related initiatives with the full support of Fujifilm DMS' Managing Director and the SLT. The Task Force members include the SLT (including the Managing Director), members of the Legal Department, the Finance Department and all vendor managers from each business group within Fujifilm DMS. Members of the Task Force play a crucial role in ensuring Fujifilm DMS' Modern Slavery

reporting obligations are being met, which includes the responsibility to not only monitor and engage with Fujifilm DMS' suppliers but also to ensure compliance with its Modern Slavery compliance program and monitor Modern Slavery risks within in its operations, including FBSMS and DMSP. In order to reduce the risk of Modern Slavery practices being present in its operations, Fujifilm DMS maintains and enforces stringent processes in on-boarding and managing the engagement of all staff, including ensuring their right to work in the relevant country as well conducting reference checks, criminal history checks and probity checks.

Action: Issuing Modern Slavery Questionnaire and Secondary Questionnaire

For this reporting period, Fujifilm DMS maintained and upheld the issuance of its existing Modern Slavery Questionnaire to its suppliers (new and existing) regardless of annual spend or risks including the suppliers of FBSMS and DMSP. The Modern Slavery Questionnaire is a crucial tool used by Fujifilm DMS to conduct risk assessment of its suppliers as the questionnaire has been carefully designed and tailored to the industry in which Fujifilm DMS operates in.

In addition, Fujifilm DMS also issued a Secondary Modern Slavery Questionnaire to high risk suppliers to engage with suppliers assessed to have fallen into a higher risk category based on a combination of geographic, sector, entity and/or industry factors and where their responses to our previous Modern Slavery Questionnaire were incomplete or lacked evidence of mitigation strategies and measures. Fujifilm DMS' aim of issuing the Secondary Modern Slavery Questionnaire was to further clarify any potential risks of Modern Slavery or lack of mitigation strategies and procedures in its higher risk suppliers, gain a better understanding of their processes and circumstances, and to assist such high risk suppliers to develop an action plan to eradicate the risk of Modern Slavery in a transparent, timely and efficient manner (to the extent possible) which is in accordance with the Fujifilm DMS' Modern Slavery Policy.

Fujifilm DMS will continue to assess the effectiveness of its Modern Slavery Questionnaire and the Secondary Modern Slavery Questionnaire along with the response rate and quality of responses to those questionnaires to determine and implement further modifications or improvements that may be required to improve vendor engagement, and assist with the understanding and assessment of its suppliers' Modern Slavery risks.

Action: Continued Efforts to Engage with Fujifilm DMS' Suppliers

During this reporting period, Fujifilm DMS continued to assess the risks of suppliers who were engaged in the previous reporting period but were non-responsive or partially responsive at the time of engagement or suppliers which did not complete the Modern Slavery Questionnaire in the previous reporting period being engaged close to the end of the financial year, and any new suppliers engaged in the past 12 months. We have also encouraged those who have previously completed our earlier versions of the Modern Slavery Questionnaire to complete our most recent Modern Slavery Questionnaire. This way, Fujifilm DMS endeavoured to capture all of its suppliers to conduct the risk assessment. Fujifilm DMS' vendor managers continued to follow up with those non-responsive and partially responsive suppliers to ensure that the Modern Slavery Questionnaires were eventually completed or supplemented for our risk assessment and risk mitigation purposes.

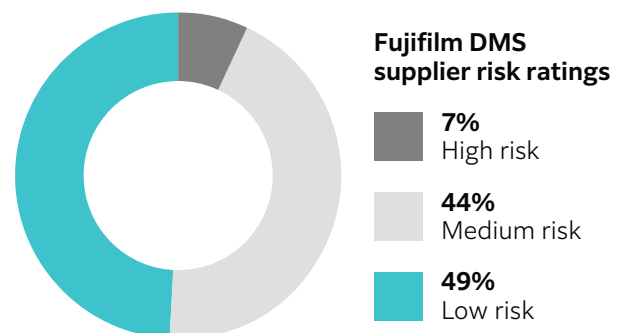
It was observed that the Questionnaires had been completed by a variety of different personnel holding different positions within the supplier's entity and there was a wide variation in the departments and titles of those responsible amongst the suppliers for overseeing and managing Modern Slavery risks. For example, responsible personnel from some of our suppliers included persons from their legal department, compliance and risk team, human resources, the managing director, senior managers, procurement staff, operations managers, CFO, committee or commercial managers. In many instances with smaller businesses, the owner or director of the business would be directly responsible for managing Modern Slavery risks.

Approximately 72 Fujifilm DMS suppliers responded in the current reporting period to the Modern Slavery Questionnaire. About 22% of the suppliers that responded within this reporting period were entities that were required to report or voluntarily reported under the Modern Slavery Act. However, the majority of suppliers were smaller suppliers, with less than 100 employees making up 63% of the suppliers engaged with during this reporting period and 33% of suppliers were using some form of labour hire.



There were a varied and mixed number of processes and measures from supplier to supplier to mitigate against Modern Slavery risks in their supply chain and within their own organisation. Examples included implementation of a Modern Slavery policy, having a formal hiring or recruitment process, inclusion of contractual clauses requiring suppliers to not engage in Modern Slavery, conducting education and training of staff on the risks of Modern Slavery, having a whistleblower process in place, carrying out periodic supplier audits, conducting supply chain mapping to gain a better understanding of their supply chain and preferring or exclusively using local Australian suppliers.

Continuing from the previous reporting period, Fujifilm DMS maintained its risk assessment process for identification and assignment of risk ratings against its suppliers. Where suppliers indicated in their response to the Modern Slavery Questionnaire that they have mitigation processes and practices in place, or they operate in a country or industry that has lower inherent risks, their risk rating would be reduced accordingly. In this reporting period of the questionnaires assessed, approximately 7% of Fujifilm DMS' supply chain consists of higher risk suppliers, 44% medium risk suppliers and 49% low risk suppliers.



Fujifilm DMS will continue to engage with its suppliers to provide better support and assistance and explore options to supply educational and informative resources to assist with their understanding of the various forms of Modern Slavery and importance of the implementation of internal processes in identifying and mitigating the risks of Modern Slavery. Fujifilm DMS intends to undertake further engagement and analysis of those suppliers who fall into the higher risk category, to educate those suppliers and may engage with those suppliers and consider mitigation measures that can be put in place to further assist them if necessary.



Action: Understanding & Engaging with DMSP's Operations and Suppliers

During this reporting period, as part of our overall Modern Slavery compliance program for Fujifilm DMS, we have conducted internal risk assessment of the DMSP's operations and its supply chain.

Considering the suppliers who directly supply to DMSP would likely have a higher geographic risk of Modern Slavery practices as they are mostly located in the Philippines and the Philippines is ranked 30th in the Global Slavery Index 2018 for prevalence of Modern Slavery, Fujifilm DMS and DMSP continued to work together to better understand the operations of DMSP's main suppliers and the environment that they operate in. It was noted that there were approximately similar number of suppliers engaged by DMSP in this reporting period to that of the last reporting period. It was further noted that COVID-19 contributed to the shortage of labour in the job market for DMSP operations during this reporting period.

Throughout this reporting period, there were regular communication with DMSP's vendor managers to ensure that suppliers were completing their Modern Slavery Questionnaires adequately, and that all suppliers were issued with the Fujifilm Supplier Code of Conduct during the engagement stage for their endorsement and acknowledgement. Senior DMSP management personnel were engaged to ensure that they were aware of and were implementing the requirements under Fujifilm DMS' Modern Slavery Policy and due diligence procedures.



Following an analysis of the responses from DMSP's suppliers over the past and current reporting periods, it has become apparent that there is an overall deficiency in understanding of Modern Slavery risks amongst the Philippine suppliers particularly around awareness of what is Modern Slavery, what constitutes Modern Slavery and how Modern Slavery can occur throughout a supply chain. It is likely that this lack of knowledge and understanding is partly due to the lack of similar or equivalent Modern Slavery reporting regime similar to the Australian Modern Slavery Act in the Philippines and therefore understanding of Modern Slavery may be limited. It naturally flows from this that there will also be some deficiency in awareness and understanding of ways to mitigate and reduce Modern Slavery risks within the suppliers' business operations and their supply chain.

As a further risk mitigation strategy, Fujifilm DMS have ranked the DMSP suppliers based on its annual spend and conducted additional media monitoring exercises on the higher ranked DMSP suppliers during this reporting period. Results of these media monitoring exercises indicate that most of these key DMSP direct suppliers are not registered in the top 10 countries that are deemed as having highest inherent risks in Modern Slavery practices (ranking as per the Global Slavery Index Report 2018). The media monitoring exercise of these key suppliers found no adverse findings relating to Modern Slavery. However, many of the suppliers had little to no reference to the activities they conduct in relation to the Modern Slavery risks on their respective websites. This finding further emphasised the lack of public exposure and enquiries into the prevalence of Modern Slavery in the Philippines market which may have been the cause for the lower response rate to the Modern Slavery Questionnaire from the DMSP suppliers compared to the Fujifilm DMS suppliers. We have observed that for the many of the local and smaller-sized DMSP suppliers, it was their first time encountering or being requested to complete a Modern Slavery Questionnaire or equivalent. To aid their understanding, our Modern Slavery Questionnaire includes Frequently Asked Questions section which provides some explanation as to what Modern Slavery is, why we place emphasis on this topic and how to complete the Modern Slavery Questionnaire. The Legal Department and the vendor managers were also on standby to answer any questions relating to Modern Slavery and our compliance efforts from the suppliers. As such, Fujifilm DMS will continue to collaborate with DMSP vendor managers to assess and address the Modern Slavery risk in the suppliers' operations. Fujifilm DMS may consider providing additional assistance in helping DMSP suppliers to better understand the context and importance to combat Modern Slavery by providing a supplemented information brochure to key suppliers when issuing the Questionnaire.

Action: Understanding & Engaging with FBSMS' Operations and Suppliers

Given the acquisition of FBSMS during this reporting period, FBSMS' operations and suppliers have been included into the scope of risk assessment and due diligence by Fujifilm DMS for this reporting period.

Fujifilm DMS and FBSMS worked closely with the FBSMS vendor managers to ensure they understood the Fujifilm DMS' Modern Slavery obligations, compliance procedures and the purpose of those procedures.

In particular, the Task Force worked very closely with the key FBSMS personnel across different business teams, including IT Support, Sales, as well as senior management to better understand the operations of FBSMS and its main suppliers. Due to the recent nature of the acquisition and as Fujifilm DMS is in the process of gaining deeper understanding of the details of FBSMS' operations and supply chain, Fujifilm DMS performed media monitoring on the key suppliers of FBSMS to supplement the risk assessment of FBSMS supply chains. Results of such media monitoring activities indicate that most of FBSMS' key direct suppliers are not registered in countries that are deemed to have higher inherent risk in Modern Slavery practices.

Throughout this reporting period, Fujifilm DMS also regularly liaised with FBSMS' vendor managers to ensure that the suppliers were completing the Modern Slavery Questionnaires adequately, and that the suppliers were issued with the Fujifilm Supplier Code of Conduct during the engagement stage for their endorsement and acknowledgement. Regular email communication took place with FBSMS' senior management to ensure that they were aware of and were implementing the requirements under Fujifilm DMS' Modern Slavery Policy and due diligence procedures.

Fujifilm DMS will continue to review its existing processes and proactively partake in consultation with FBSMS vendor managers to identify, assess and address the Modern Slavery risk in its operations and formulate more targeted strategies tailored to the circumstances of FBSMS to improve the quality of risk assessment of its supply chain. Fujifilm DMS will also seek to provide better support and resources to educate and help suppliers to understand the risks of Modern Slavery and for vendor managers to partake in more meaningful engagement with FBSMS' key suppliers, potentially through targeted training for FBSMS vendor managers.

Action: Screening and Management Processes for Non-Responsive Suppliers

As part of the vendor setup process, vendor managers are required to send the Modern Slavery Questionnaire to their respective suppliers. This ensures that all new suppliers were captured in the reporting period at the onset of the supplier relationship, with the aim to broaden Fujifilm DMS' visibility of its supply chain and to get an initial assessment on incoming suppliers.

Further, Modern Slavery considerations continue to form a part of Fujifilm DMS' vendor management framework and guidelines, whereby vendor managers are to take into account the risk of Modern Slavery associated with a supplier or within that supplier's extended supply chain before the engagement of that supplier. This forms a part of Fujifilm DMS' overall strategy to embed effective and permanent processes that deal with Modern Slavery in key gateways of its business.

The 'Frequently Asked Questions' section of Fujifilm DMS' Modern Slavery Questionnaire continues to serve as an effective means of providing some fundamental information on Modern Slavery including the definition and categories of Modern Slavery to the recipients of the questionnaire. This aspect of the questionnaire has been maintained and is intended to be updated in the next reporting period as we onboard and automate the issuing and collection of the questionnaires.



Further, the Supplier Code of Conduct provided to all suppliers, including DMSP and FBSMS' suppliers, notifies suppliers that Fujifilm DMS may request that they conduct a self-assessment in compliance with the code or provide further information when requested and that they are expected to provide an open and honest response and take corrective action if required.

Unfortunately, we did not receive a response from all suppliers that were issued a Modern Slavery Questionnaire in this reporting period. Contributing factors could include COVID-19 impacts on businesses, staffing shortages in the current labour market, resourcing issues and a possible lack of awareness of what Modern Slavery risks are and the related requirements in Australia. Fujifilm DMS continues to work with its vendor managers to achieve a higher response rate through continued and active engagement with its suppliers and potentially with the onboarding of the new third-party software.

Where Fujifilm DMS received incomplete or inadequate responses from its suppliers that hindered the ability to conduct a meaningful risk assessment on that supplier, efforts were made to re-engage with the supplier to request to supplement the deficiencies. Or, in instances where suppliers have rejected the Modern Slavery Questionnaire and sought to provide an internal document in lieu of it, at first instance an attempt was made to assess the nature and utility of the document provided and conduct risk assessment on that supplier using the information that is available in those documents. This included analysis of Modern Slavery Statements submitted by the supplier (where available), or other documents provided to Fujifilm DMS such as internal policies, declarations, or reports. Where there was insufficient information available in the documents provided to enable the conduct of the risk assessment on the supplier, efforts were made to re-engage with those suppliers to request for completion of the Modern Slavery Questionnaire.

Action: Increasing Modern Slavery Awareness throughout the Organisation

Fujifilm DMS has an extensive onboarding process that involves mandatory interactive training for all new staff on employee rights and entitlements, leave entitlements, the right to terminate/resign from employment, the Fujifilm DMS Anti-Bribery and Corruption policy and the Fujifilm DMS Whistleblower policy.

The onboarding process also includes mandatory training on Modern Slavery, with an emphasis on:

- What Modern Slavery is and the various forms it can take;
- Fujifilm DMS' commitments to ensure its operations are free from Modern Slavery;
- How to identify Modern Slavery and signs of Modern Slavery;
- Actions to take if employees become aware of or suspect Modern Slavery is occurring; and
- Making disclosures under the Fujifilm DMS Whistleblower Policy.

Such mandatory training is enforced strictly by Fujifilm DMS.

Additionally, periodic vendor manager training is provided to ensure vendor managers understand what modern slavery risks are, understand the requirements under Fujifilm DMS Modern Slavery Policy, requirements under the legislation, understand Fujifilm DMS Modern Slavery compliance processes as it relates to the vendor risk assessment and in dealing with the vendors and therefore are equipped to build relationships with suppliers and engage with them. The Modern Slavery training for the vendor managers is intended to be conducted in the next reporting period once the third-party risk assessment software is officially implemented. All vendor managers will be trained on the adjustments made to the existing Modern Slavery compliance processes. Vendor manager trainings may include mock scenarios of Modern Slavery occurring in an Australian company's supply chain, common goods that posed a Modern Slavery risk and information on what Fujifilm DMS' obligations are and responsibilities of vendor managers.

Fujifilm DMS' Legal Department members engaged in the Modern Slavery Project and were a part of the Task Force have also continued to attend legal educational seminars in relation to Modern Slavery identification, analysis and mitigation as well as forecast on upcoming legislative changes throughout this reporting period.

Action: Supplier Due Diligence & Media Monitoring

Fujifilm DMS maintained the active monitoring initiative which involves the monitoring of changes and trends affecting Modern Slavery in Australia and globally so that Fujifilm DMS is able to adapt and respond quickly to mitigate any potential risk of Modern Slavery. This exercise also extends to the monitoring of media reports and public sources that are available on the supplier's company websites or are otherwise generally available on the internet in relation to high risk and high spend Fujifilm DMS, DMSP and FBSMS suppliers, including but not limited to any adverse or positive media coverage, their general commitment to combating Modern Slavery within their operations and supply chain, their activities, industry and the countries of their operations. Examples of some of the sources that have been reviewed include news publications, investigative journalism articles, court judgments, NGO reports and government reports.

Media monitoring was conducted both at a general and targeted basis. The general media monitoring was performed on product-based Modern Slavery risks and trends, and global legislative developments relating to Modern Slavery. The specific and targeted media monitoring was performed on high spend and non-responsive suppliers and suppliers that are deemed to be high risk based on our internal risk assessment. Through this process, Fujifilm DMS is better positioned to verify the risks associated with certain suppliers and industries and also gain greater visibility of current events and trends that influence the risk of Modern Slavery in the supply chain.

Action: Annual Supplier Audits

During this reporting period, supplier audits were undertaken on various operational suppliers such as labour hire, equipment, waste management and print production suppliers by the Quality Department at Fujifilm DMS. The scope of these audits is to check and confirm compliance with expectations and policies around quality, information security, privacy, environmental sustainability, labour, human rights, corporate ethics and anti-bribery and corruption. This will be continued going forward into the next reporting period.

The audits are conducted on an ongoing basis and for suppliers that are classified as critical to Fujifilm DMS, the audit will recur annually. The audit forms part of our quality management process and provides visibility over the measures put in place by suppliers and whether suppliers are acting in a socially responsible and ethical manner. In relation to Modern Slavery, the audit investigates the systems in place to ensure minimum wages, working hours, leave and right to work are monitored, assess whether employee visa and rights to work are monitored and recorded, whether policies are in place to prohibit the use of child labour and whether workers have the freedom to join labour unions or organisations and enter into collective bargaining.



Steps Taken to Assess Effectiveness and Future Actions

Fujifilm DMS continues to review, assess and improve on processes and procedures.

To assess and evaluate its actions, Fujifilm DMS continue to liaise with vendor managers, suppliers and the SLT to understand ways to improve the effectiveness of its existing processes. Fujifilm DMS held regular progress meetings to review the status of and progress made in relation to the ongoing Modern Slavery Project, through the review of the operations, supplier engagement and management processes of Fujifilm DMS. During the review process, if any areas of improvement are identified, existing processes are either modified, replaced and/or new process was introduced to the existing process to address the identified areas. This is an ongoing process with an aim to maximise the effectiveness of Fujifilm DMS' Modern Slavery Project and to continuously make improvements in the relevant areas.

Updates to the Modern Slavery Project were provided to the SLT and where necessary, active participation and assistance were requested and expected of the SLT to ensure the Modern Slavery Project does not lose focus and momentum, and that actions taken are effective.

Fujifilm DMS has also responded to a number of Modern Slavery Questionnaires issued by its own customers during this reporting period. In doing so, Fujifilm DMS has been able to use these customer questionnaires as opportunities to better understand the expectations of its customers and the market standard in relation to Modern Slavery, to 'test' its own Modern Slavery measures against a third party's evaluation criteria and to assess the measures it has taken to mitigate the risk of Modern Slavery to date.

Fujifilm DMS will continue to review and improve its processes and progress its efforts towards a comprehensive and effective Modern Slavery program. Some measures that Fujifilm DMS may implement to further improve the effectiveness of its current Modern Slavery compliance program for the future reporting period include:

- Providing training to vendor managers to reinforce Modern Slavery compliance requirements, and, if necessary, to provide training on adjustments made to the existing compliance procedures as result of deployment the third-party risk assessment automation software;
- Review and update the Modern Slavery Policy to also reflect any procedural improvements made as result of deployment of the third-party risk assessment automation software, where necessary;
- Review and update the mandatory online interactive training for all employees relating to Modern Slavery, where necessary to reflect any procedural changes;
- Review and update the Supplier Code of Conduct as a periodic update and to reflect any changes and improvements to the existing compliance procedures;
- Review and update the Vendor Management Framework to also reflect upcoming changes to the existing vendor onboarding procedures as a result of deployment of the third-party risk assessment automation software, and Modern Slavery risk assessment matrix as required;
- Creation of an information pack for suppliers and vendor managers to assist with their Modern Slavery understanding;
- Continue to conduct audits of Fujifilm DMS' supplier onboarding processes and the supply chain;
- Continue to review and assess the effectiveness of its Modern Slavery compliance program and where necessary, develop action plans with long term targets to expand on current methods of assessment;
- Continue to perform case studies for goods or services that are high risk and perform detailed analysis on the industries, practices and supply chains associated with these goods and services;
- Continue to analyse procurement and essential/high value suppliers in the Philippines and for FBSMS.



Consultation

FUJIFILM Data Management Solutions and FUJIFILM Data Management Solutions Australia are joint reporting entities under this Statement. FUJIFILM DMS entities have shared management teams, corporate functions, policies and processes. During this reporting period, FUJIFILM Data Management Solutions and FUJIFILM Data Management Solutions Australia consulted with each other, and the consultation also took place between the management teams and the Task Force members prior to preparing this Statement.

As part of the development of this Statement, consultation also extended to communicating with senior management personnel from DMSP and FBSMS to obtain information required to conduct an assessment and analysis of the risks of Modern Slavery in Fujifilm DMS' operations and supply chain for the purposes of this Statement. Prior to this Statement being put to the Board for review and approval, the Statement was reviewed by members of the SLT, who are responsible for the management of both FUJIFILM Data Management Solutions and FUJIFILM Data Management Solutions Australia.