



# From our Managing Director

FUJIFILM Data Management Solutions Pty Ltd and FUJIFILM Data Management Solutions Australia Pty Ltd present our 2025 joint Modern Slavery Statement ("**Statement**") under the Modern Slavery Act 2018 (Cth) ("**Modern Slavery Act**").

Modern slavery is a harsh reality in today's world, impacting an estimated 50 million people globally. Taking various forms such as forced labour, debt bondage, human trafficking, slavery-like practices and exploitation of children, modern slavery is often hidden from view and can be easily overlooked. We recognise that not finding instances of modern slavery does not guarantee its absence and that modern slavery can be present in the supply chain of the products or the services we engage every day.

To tackle these concerns, we have established frameworks and implemented various strategies to identify and address modern slavery risks in our operations and supply chain with the aim of preventing instances of modern slavery. This includes establishment and regular review of policies, maintaining and increasing supplier engagement, conducting ongoing due diligence, training of relevant personnel and setting up grievance mechanisms. During this financial year, our focus was on strengthening supplier engagement by working to improve supplier response rates to risk assessment/Questionnaires, and in turn, providing us with greater insight into our supply chain.

We remain committed to continually enhancing our processes to prevent and eliminate modern slavery and associated risks within our business operations and supply chains. We will continue to stay vigilant and further refine our framework to respond proactively to any future legislative developments and any guidance issued by the newly appointed Commonwealth Anti-Slavery Commissioner.

### **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 2024 to 31 March 2025. This Statement was approved at the board meeting held on 8 July 2025.

### **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 Data Management Solutions Pty Ltd and FUJIFILM Data Management Solutions Australia Pty Ltd to meet the requirements of the Modern Slavery Act and the mandatory criteria and guidelines for modern slavery statements.

andatory criteria	Page number/s	
Section a) Identify the reporting entity.	4	
Section b)  Describe the reporting entity's structure, operations and supply chains.	4 - 11	
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.	12 - 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 - 22	
Section e)  Describe how the reporting entity assesses the effectiveness of these actions.	23 - 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	

### Reporting Entities and Reporting Period

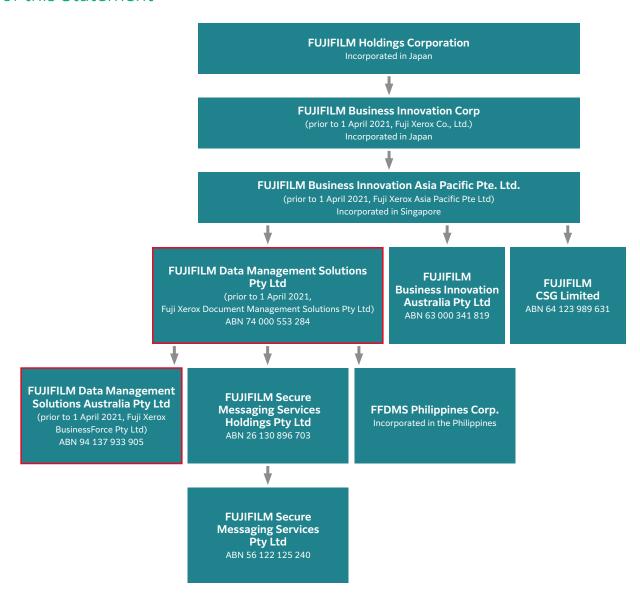
FUJIFILM Data Management Solutions Pty Ltd ("FUJIFILM Data Management Solutions") and FUJIFILM Data Management Solutions Australia Pty Ltd ("FUJIFILM Data Management Solutions Australia") are the reporting entities under the Modern Slavery Act. This Statement is the sixth statement for FUJIFILM Data 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 2024 and ending on 31 March 2025 (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. For clarity, this is defined below.

### Fujifilm DMS at a glance

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

### **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 ultimate holding company, FUJIFILM Holdings Corporation, has been a member of the United Nations Global Compact 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. It has 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 ("**FBSMS**"). FBSMS provides business SMS gateway services. FUJIFILM Data Management Solutions 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.

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 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 sister companies 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").

Together, the Group Charter, Group Code, and Human Rights Statement 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 Nationals 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 is based on the Group Charter and Code of Conduct, which both declare FUJIFILM Group's respect for all human rights. The basic principles on respect for human rights 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 addresses the employment and conditions of employment of employees, demonstrating the commitment across the FUJIFILM Group to ensure that employment across its operations 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 published on the website. Both the Group Charter and the Group Code have also been published in multiple languages.



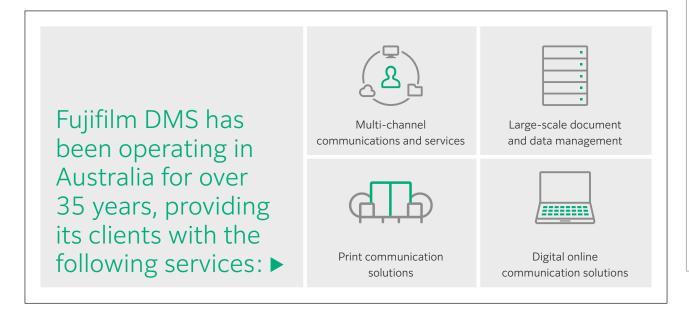
#### **Sustainable Value Plan 2030**

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, one 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 build a more robust supply chain through collaboration with the suppliers and partners that will strengthen the existing CSR foundations and its processes within the FUJIFILM Group.

### Fujifilm DMS Operations

Fujifilm DMS has operations in Australia (with a presence in states and territories across Australia) and the Philippines. It's Philippine-based subsidiary entity, DMSP, plays an integral back-office Information Technology/Technology and Professional Services ("**TaPs**") and business support function for Fujifilm DMS' operations. Additionally, FBSMS supports Fujifilm DMS' operations and provides business SMS gateway services to the customers. Fujifilm DMS also extends its reach across Asia Pacific region, by partnering with other FUJIFILM Group entities in the region.



At the end of this reporting period, Fujifilm DMS had approximately 795 employees across 9 sites in Australia including offices and operations sites. It had approximately 168 employees based at its Manila, Philippines offices. Additionally, FBSMS had approximately 2 employees in Australia. Fujifilm DMS' business divisions consist of the following departments: TaPS, Finance, Legal, Sales and Marketing along with relevant state's own Operations, Quality and Human Resources departments.



### Fujifilm DMS Supply Chain

Fujifilm DMS utilises a variety of goods and services within its immediate supply chain. For this reporting period, goods and services were sourced from the following areas within their respective Subdivision as they fall under a broader division.

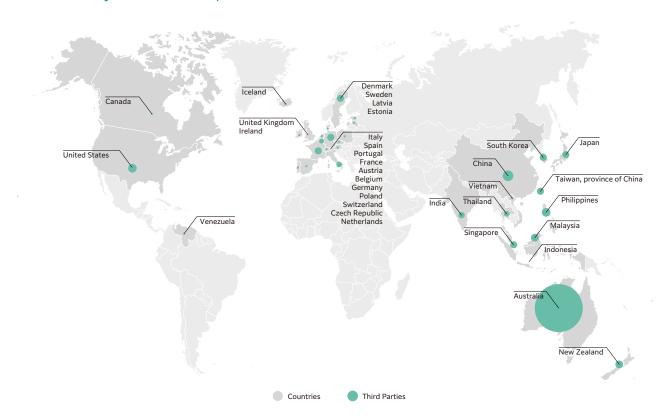
For Fujifilm DMS, we note the Divisions with the majority of selections involve 'Professional, Scientific and Technical Services' including legal, accounting and consulting services, 'Manufacturing' including printing and printing support, 'Other services' including repair and maintenance as well as 'Information, Media & Telecommunications'. Other divisions with fewer selections included 'Retail trade', 'Construction' and 'Wholesale Trade' in the order listed. The divisions involved in our supply chain are outlined in the graphic below.

Division	Sub Division
Accommodation and Food Services	<ul><li>Accommodation</li><li>Food and Beverage Services</li></ul>
Administrative and Support Services	Administrative Services
Construction	<ul><li>Building Construction</li><li>Construction Services</li></ul>
Education and Training	<ul> <li>Adult, Community and Other Education</li> <li>Tertiary Education</li> <li>Preschool and School Education</li> </ul>
Electricity, Gas, Water and Waste Services	<ul><li>Electricity Supply</li><li>Gas Supply</li><li>Waste Collection, Treatment and Disposal Services</li></ul>
Financial and Insurance Services	<ul><li>Auxiliary Finance and Insurance Services</li><li>Finance</li></ul>
Health Care and Social Assistance	<ul><li>Medical and Other Health Care Services</li><li>Residential Care Services</li></ul>
Information, Media and Telecommunications	<ul> <li>Internet Publishing and Broadcasting</li> <li>Internet Service Providers, Web Search Portals and Data Processing Services</li> <li>Publishing (except Internet and Music Publishing)</li> <li>Telecommunications Services</li> <li>Library and Other Information Services</li> </ul>

Division	Sub Division
Manufacturing	<ul> <li>Basic Chemical and Chemical Product Manufacturing</li> <li>Beverage and Tobacco Product Manufacturing</li> <li>Fabricated Metal Product Manufacturing</li> <li>Machinery and Equipment Manufacturing</li> <li>Printing (including the Reproduction of Recorded Media)</li> <li>Pulp, Paper and Converted Paper Product Manufacturing</li> </ul>
Other Services	<ul> <li>Personal and Other Services</li> <li>Private Households Employing Staff and Undifferentiated Goods- and Service-Producing Activities of Households for Own Use</li> <li>Repair and Maintenance</li> </ul>
Professional, Scientific and Technical Services	<ul> <li>Computer System Design and Related Services</li> <li>Professional, Scientific and Technical Services (Except Computer System Design and Related Services)</li> </ul>
Rental, Hiring and Real Estate Services	<ul> <li>Property Operators and Real Estate Services</li> <li>Rental and Hiring Services (except Real Estate)</li> </ul>
Retail Trade	<ul><li>Food Retailing</li><li>Other Store-Based Retailing</li></ul>
Transport, Postal and Warehousing	<ul><li>Road Transport</li><li>Transport Support Services</li><li>Warehousing and Storage Services</li></ul>
Wholesale Trade	<ul> <li>Machinery and Equipment Wholesaling</li> <li>Other Goods Wholesaling</li> <li>Motor Vehicle and Motor Vehicle Parts Wholesaling</li> <li>Basic Material Wholesaling</li> </ul>

During this reporting period, we note the majority of Fujifilm DMS' direct suppliers are based in Australia with registered offices in Australia. However, through an analysis of supplier responses to Fujifilm DMS' Risk Assessment Questionnaire (Fujifilm DMS' Modern Slavery risk assessment tool, referred to as 'Questionnaire' throughout this statement), Fujifilm DMS identified that based on the responses received, about a third of goods and services provided by these suppliers are sourced from, or originate in, countries outside Australia. During this reporting period, Fujifilm DMS utilised third-party software to map the geographic locations of its Tier 1 supply chain. The map below illustrates the global footprint of our supply chain based on this analysis.

### Third Party Business Operations



In comparing the above supply chain map to the last reporting period, we note the countries identified remain the same as countries identified in the last reporting period.

During this reporting period, FBSMS continued to engage with a limited number of suppliers, the majority of whom are based in Australia. Others are based in Germany, Sweden, Ireland, United States, Poland and New Zealand. Out of those FBSMS direct suppliers who responded to the Questionnaire, the majority are identified as telecommunications service providers and their country of operations include Australia, Singapore, Malaysia, Philippines, Germany, Serbia and India. 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 in nature. During this reporting period, we note most of DMSP's suppliers continue to be based overseas due to its operations in the Philippines.

## Modern Slavery defined

The Modern Slavery Act 2018 (Cth) defines modern slavery as including eight types of serious exploitation. The following definitions are from the 'Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities (May 2023)', page 76-80. We include this in our statement for educational and awareness purposes.

Type of Exploitation	Definition
Trafficking in persons	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
Forced labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Forced marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Debt bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
The worst forms of child labour	<ul> <li>Describes situations where children are:</li> <li>exploited through slavery or similar practices, including for sexual exploitation</li> <li>engaged in hazardous work which may harm their health, safety or morals</li> <li>used to produce or traffic drugs.</li> </ul>
Deceptive recruiting for labour or services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

### Risks

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

For this reporting period, Fujifilm DMS continued to assess the potential Modern Slavery risks in Fujifilm DMS' operations and supply chains. For our risk assessment, we sought to identify and assess our exposure to modern slavery risks in our operations and supply chains based on the risk factors from the 'Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities (May 2023)' Appendix 1 Table 6, as set out below.

Examples of risk indicators	
Industry Risks	<ul> <li>Use of short-term contracts and outsourcing.</li> <li>Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken in the evening or in remote locations, such as security or cleaning.</li> <li>Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities.</li> </ul>
Supply Risks	<ul> <li>The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> <li>The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> </ul>
Geographic Risks	<ul> <li>The country is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs.</li> <li>The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards.</li> <li>The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination.</li> </ul>
Entity Risks	<ul> <li>Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources.</li> <li>Entity's procurement and sourcing processes appear poorly managed or inefficient.</li> </ul>

While we note this table assists Fujifilm DMS to assess the risk in its operations and supply chain, we acknowledge the risk assessment for suppliers are mainly performed using our third-party risk assessment software. Nonetheless, the risk indicators above assist us in assessing risk in our operations and supply chain, particularly where the software may not be able to produce any assessment, or for any manual assessments conducted.

During the reporting period, no actual instances of Modern Slavery practices were reported or identified in our operations and supply chain.

### **Potential Risks of Modern Slavery Practices in Operations**

During this reporting period and as part of its commitment under its Modern Slavery Policy and procedure, Fujifilm DMS continued to conduct its annual review to determine the risk of Modern Slavery within its own operations. The review examines Fujifilm DMS operations and involves working with other internal departments to identify and analyse potential risks of modern slavery in our operations. As with the previous reports, we found the recruitment practices around the use of labour hire agencies continue to be a potential area of risk along with the operations in the Philippines. As noted in the last reporting period, various measures continue to be in place to manage the risk arising from use of labour hire agencies. These include induction processes for temporary staff, contractual requirements around remuneration and payment of workers at award rates set out in the labour hire agreements and requiring the labour hire agencies to meet the legal requirements under applicable local labour laws through contracts and Fujifilm DMS' Supplier Code of Conduct. An additional measure introduced this reporting period include a vendor due-diligence process for labour hire agencies. This ensures that our internal teams have considered certain criteria when engaging with labour hire agencies. We believe the risks continue to be appropriately managed considering the above. Further information on the actions taken is provided later in this statement.

### **Potential Risks of Modern Slavery Practices in Supply Chain**

During this reporting period, Fujifilm DMS continued to identify and analyse industry and geographic risks of Modern Slavery in its supply chain through its third-party risk assessment software.

In prior reporting periods, Fujifilm DMS identified and classified products and services that it utilised in accordance with certain risk categories as follows:

#### Lower Likelihood of Risk **Moderate Likelihood Higher Likelihood of Risk** of Risk Power/Electricity/Gas Catering **Financial Services** (Food and Beverages) Individual Contractors Furniture and **Equipment Rental** Clothing/textiles Gym/Health and Fitness (includes uniform suppliers) Office Stationery Travel Management/ Security and Accommodation Healthcare and **Protection Services** Wellness Services **Consultancy Services IT Suppliers** Telecommunication Services (equipment and services) Insurance Labour Hire and Recruitment **Professional Services** (including legal and Postal, Courier and Logistics advertising services) 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

During this reporting period, we note third party software used for risk assessment captures products and services as part of its risk assessment. In the latest enhancements to the Questionnaire, we note updates have been made to industry (to align with ANZSIC codes) and jurisdiction scores, among other changes as outlined further below.

In addition to the general supplier analysis, Fujifilm DMS also analysed its top 10 suppliers based on spend and these suppliers provided goods and services such as delivery and postage service, financial and insurance services, manufacturing (including paper manufacturing and printing/print support services), other services such as machinery and equipment repair and maintenance, professional, scientific and technical services, administrative and support services such as employment services. The countries of operation include Australia, Germany, United States and New Zealand. Of these suppliers, 9 are based in Australia and 1 is based in Singapore. Of those who completed the Questionnaire, they have all identified as low risk.

Similarly, Fujifilm DMS has continued its efforts to map the geographical footprint of its supply chain to better understand and assess potential modern slavery risks, as outlined earlier in this statement. To evaluate the geographical risk, reference is made to the Global Slavery Index Report 2023 published by Walk Free (Walk Free is an international human rights group dedicated to ending all forms of modern slavery). The Global Slavery Index is a ranking out of 160 countries, with the higher the ranking meaning the lower the prevalence of Modern Slavery. We note the Global Slavery Index Report 2023 remained unchanged in 2024; hence the rankings below remain current. In addition, we note the Global Slavery Index Report 2023 is now incorporated into the enhanced Questionnaire and risk assessment process.

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

## Countries where Fujiflim DMS and subsidiaries source goods and services

- Iceland (-/160)
- Switzerland (160/160)
- Germany (158/160)
- Netherlands (157/160)
- Sweden (156/160)
- Denmark (155/160)
- Belgium (154/160)
- Ireland (153/160)
- Japan (152/160)
- Australia (149/160)
- New Zealand (148/160)
- Taiwan (146/160)

- United Kingdom (145/160)
- Canada (144/160)
- Austria (142/160)
- France (139/160)
- Singapore (138/160)
- Spain (136/160)
- Italy (123/160)
- United States (122/160)
- Latvia (119/160)
- South Korea (117/160)
- Portugal (113/160)
- China (111/160)

- Vietnam (108/160)
- Estonia (107/160)
- Czechia (102/160)
- Poland (80/160)
- Thailand (79/160)
- Malaysia (72/160)
- Indonesia (62/160)
- Philippines (36/160)
- India (34/160)
- Venezuela (24/160)

In addition, we continued to analyze FBSMS suppliers and the jurisdiction in which they are registered. We note the majority of FBSMS' suppliers are based in Australia which indicates lower country-specific Modern Slavery risks. We also note that out of those suppliers who completed the Questionnaire, they identified other countries of operation which included Singapore, Malaysia, Philippines, Germany, Serbia and India. Given we know some of these countries rate as higher risk on the Global Slavery Index Report 2023, we also considered the overall risk rating of the FBSMS suppliers. Of those who completed the Questionnaire, their risk score was either low or moderate risk. Going forward, we will continue to monitor FBSMS suppliers by ensuring those who have not completed the Questionnaire are followed up for completion. This will provide greater insight into our supply chain while also providing valuable risk scoring. Depending on the risk scores, an option to manage modern slavery risk with the high-risk suppliers is to promote further education and awareness, including through human rights training.

For DMSP, as its operation is based in the Philippines, the majority of its suppliers are from the Philippines. With the Philippines being ranked 36th for prevalence on the Global Slavery Index Report 2023, we note the direct suppliers of DMSP may be exposed to higher inherent risks of Modern Slavery due to the country in which they operate in. Overall, we continue to notice the lower number of response and completion rates for the Questionnaire compared to Australian suppliers, however compared to the last reporting period, there has been some noticeable increase in the completion rate. Of those who have completed the Questionnaire, the majority have a moderate modern slavery risk score. We have attributed this is mainly due to jurisdictional risk. To improve the completion rate, we initiated reminders to vendor managers to engage with non-responsive suppliers more actively. This is in addition to automated reminders sent by the risk assessment software. We aim to continue to work on improving response rates, as well as continuing to analyze suppliers who should be issued training for better education and awareness around modern slavery. These methods will assist us to have better visibility of suppliers through generation of risk scores and manage the risk of operations in Philippines. We note DMSP suppliers make up approximately 9% of our total suppliers.

We continued to utilise our risk assessment software to assess the perceived risk of suppliers onboarded for Fujifilm DMS (including DMSP and FBSMS) generally. The perceived risk rating (known as PRI, Perceived Risk Indicator) is a grading system used by the software at the time of supplier onboarding. Overall, the purpose of the PRI assessment is to enable a rapid identification of third parties with heightened risk profiles for better visibility of high-risk suppliers upon onboarding. This will also enable Fujifilm DMS to consider proportionate responses based on this risk. For example, Fujifilm DMS could use this to target high-risk suppliers for follow up to the Questionnaire and other activities as required.

During this reporting period a revised Perceived Risk Indicator with additional criteria, based on more extensive sources was developed and implemented through our third-party software. The PRI rating for the previous reporting period was based on location risk, industry risk and general media monitoring of adverse risk areas. The revised process for generating PRI ratings involves the formulation of risk ratings for suppliers based on criteria including; geographic and industry risks, the scale of the supplier's operations, specific type of product/service offering within the broader industry and nature of engagement as a supplier to FBDMS. Furthermore, supplier information sourced based on the new criteria is benchmarked against more government and intergovernmental organisation risk ratings and indexes and third-party information bureau sources, such as but not limited to the Transparency International Global Corruption Perception Index and TRACE Bribery Risk Matrix, compared to the process used in the earlier version.



The following chart with the results for this reporting period compiled utilizing the PRI process indicates that there are only slight differences with last year, mainly showing that most of our suppliers continue to have a lower risk profile on onboarding.

We note a slight change to the 'No PRI' portion when compared to the previous reporting period, showing a slight increase from 2.3% last reporting period to 5.3% this reporting period.

We have assessed that this is mainly due to the updated version of the PRI requiring compulsory supplier information to be provided prior to an assessment being able to be made, which impacted recent suppliers onboarded. In the upcoming new reporting period, Fujifilm DMS will be working towards implementing processes to address this issue.

Overall, we note that perceived high-risk suppliers continue to be less than 1%.

Chart 1 – Supplier Perceived Risk Indicator for the last reporting period

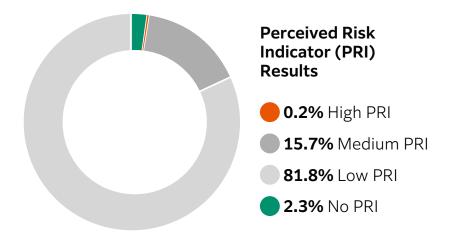
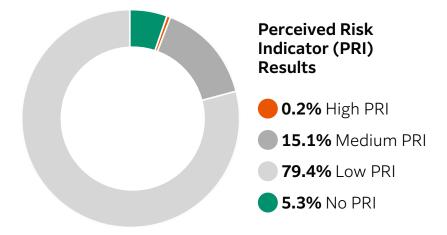


Chart 2 - Supplier Perceived Risk Indicator for this reporting period



### Actions taken to Assess and Address Modern Slavery Risks

### Key areas of actions taken to assess, address and manage Modern Slavery Risks in Fujifilm DMS (including FBSMS and DMSP)

- 1. Supplier engagement
- 2. Policies
- 3. Due Diligence
- 4. Training
- 5. Grievance mechanisms and remediation

### 1. Supplier engagement

During this reporting period, Fujifilm DMS concentrated on enhancing visibility into modern slavery risks within our supply chain by prioritising supplier engagement and increasing completion rates of our Modern Slavery Questionnaire. This focus was driven by a previously lower response rate, with the aim to improve the response rates.

To address this, our vendor managers supported the implementation of additional reminders and follow-ups with suppliers. We recognise that higher completion rates of the Questionnaire provide greater transparency across our supply chain and enable more accurate risk assessments related to modern slavery.

To further encourage participation, we introduced a Frequently Asked Questions (FAQ) document, distributed to suppliers during onboarding. This resource explains what modern slavery is, why Fujifilm DMS is committed to addressing it, offers additional information about completing the Questionnaire, time expectations and support for uncertain responses to encourage dialogue with Fujifilm DMS.

In addition, a FAQ document was also prepared and shared internally with vendor managers, addressing some common queries about Questionnaire completion.

This initiative aims to improve supplier awareness, increase transparency, and strengthen risk mitigation efforts across the supply chain.



#### 2. Policies

As part of our regular review cycle during the reporting period, we reviewed and updated the below documents. Some updates related to changes to internal processes for the purpose of improving supplier visibility to modern slavery risk.

Fujifilm DMS remains committed to staying informed of any changes to modern slavery legislation and related guidance and will continue to revise relevant policies and documents as needed.

Policy, procedure or document	Details on how the policy, procedure or document supports the Modern Slavery compliance activities
Modern Slavery Statement	The Modern Slavery Statement outlines the processes and actions undertaken each financial year to ensure compliance with the Australian Modern Slavery Act 2018 (Cth).  The Modern Slavery Statement is published on the Australian government's Modern Slavery Statement registry.  It is also available on our website.
Modern Slavery Policy	The Modern Slavery Policy references the Group Charter and the Group Code, details our supply chain and operations compliance processes and the existing remediation and investigation process of actual or suspected Modern Slavery occurrence within our supply chain.  It outlines our approach to engaging with personnel and suppliers, sets out our requirements and expectations in relation to issues of modern slavery in our operations and supply chain, and define the responsibilities of internal stakeholders in managing supply chain risks.  The policy applies to all employees working in Fujifilm DMS' operations and aims to address every aspect of Fujifilm DMS supply chain. A copy is issued to all vendor managers of FBSMS and DMSP. It is available on the Fujifilm DMS staff intranet.

### 3. Due Diligence

### Third-party risk assessment platform

Fujifilm DMS continued to use its third-party risk assessment platform to automate the supplier onboarding, risk assessment and issuing the Questionnaire. During this reporting period, we note enhancements made through the risk assessment software:

- 1. Enhanced Questionnaire to include greater coverage on Australian human rights regulations, updates to the high-risk products list, industry risk scores and jurisdiction risk scores. The updates to the risk scores associated with country, industry, product and indigenous populations are based on the latest Global Slavery Index and the industry lists based on the Australian and New Zealand Standard Industrial Classification (ANZSIC). It also introduced new questions that can trigger a high-risk scenario to cause a maximum risk score of 10.
- 2. Enhanced Perceived Risk Indicator was introduced, with additional criteria, and based on more extensive sources, as mentioned in the earlier part of the statement.

Fujifilm DMS evaluated its software and found it effective in supporting the modern slavery risk assessments. Fujifilm DMS will continue to review its processes and procedures to best incorporate any ongoing enhancements of the third-party software to achieve the best possible outcome.

### Supplier Risk Assessment

Fujifilm DMS continued to assess the risks of its suppliers during the reporting period. With the third party risk assessment software, the following tasks were performed:

Perceived Risk Rating	Automated risk rating was generated for the majority of suppliers onboarded based on the industry, location and public risk profile using certain weightings for each.  However, during this reporting period, the process for generating perceived risk ratings was enhanced by the third-party software provider, as detailed above. Going forward, Fujifilm DMS will work on introducing processes so that additional information can be captured about the supplier at the outset for the enhanced perceived risk assessment to be performed.
Modern Slavery Questionnaire	During this reporting period, an updated latest enhanced version of the Questionnaire, was sent to newly onboarded suppliers and suppliers who did not complete the previous version of the Questionnaire since its introduction, through our third-party software which administers Questionnaires to suppliers and conducts risk assessments on an automated basis.  New suppliers will continue to receive the enhanced Questionnaire and the Supplier Code of Conduct during onboarding.
Risk Rating for the Modern Slavery Questionnaire	Automated risk rating was generated for the Questionnaire responses received. The risk rating was generated in consideration of the following areas of risk factors: Geography, Activity, Workforce, Policies and Systems and Human Rights.  In addition, updated risk ratings were generated for suppliers who completed the enhanced version of the Questionnaire developed and released to suppliers during the reporting period.
Manual risk assessment of Modern Slavery Questionnaire	During this reporting period, we have continued to accept any completed manual Questionnaires that were sent to suppliers in the past. The responses to such Questionnaires were added to the risk assessment software to produce a risk score consistent in method with risk scores issued to other suppliers. For manual Questionnaires where this could not be performed (for e.g. the questions in the Questionnaire did not align with current questions on the software), a manual risk assessment was conducted.

#### **Results from the Questionnaire**

During this reporting period, we noted an increase in supplier response rate. Approximately 37.28% of Fujifilm DMS suppliers (including those of its subsidiaries) responded in the current reporting period. This represents a 43.92% increase in the response rate compared to the previous reporting period, however noting that during the last reporting period, it was the first year of onboarding suppliers using the software.

This increase was likely attributable to:

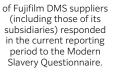
- automated reminders sent through the software as well as increased reminders and prompts to vendor managers to engage with suppliers for completion of Questionnaires. This facilitated a more comprehensive risk assessment of our supply chain and hence improved supply chain visibility; and
- updating supplier list by removing suppliers who are no longer a Fujifilm DMS supplier. This ensures an accurate and up-to-date list of suppliers. To monitor those suppliers removed in the event they do become a supplier of Fujifilm DMS in future, we have implemented internal processes to prompt the supplier to complete the Questionnaire/risk assessment, during the onboarding process.

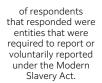
In addition, we identified the following from analyzing the results of the Questionnaire/risk assessment:

- Approximately 6.29% of suppliers that responded within this reporting period, compared with 18.8% that responded in the last reporting period, said they were entities that were required to report or voluntarily reported under the Modern Slavery Act.
- Approximately 9.73% of suppliers responded to the Questionnaire via manual Questionnaire or by providing their own Modern Slavery Statement in lieu of a completed Questionnaire.
- Approximately 65% of supplier responses included Australia as the country where they produce the goods/services that are supplied to us.



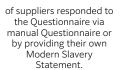




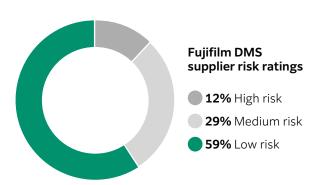












In this reporting period, out of the Questionnaires assessed using the risk assessment software, approximately **12%** of Fujifilm DMS' supply chain consisted of higher risk suppliers (marginal increase from 10.5% in the last reporting period), **29%** medium risk suppliers (decrease from 39.8% in the last reporting period) and **59%** low risk suppliers (increased from 49.8% in the last reporting period) in respect to modern slavery risk.

The risk profile of our suppliers assessed in this reporting period was based on the introduction of a revised Questionnaire with more comprehensive questions which gauged the supplier's compliance with human rights regulations in Australia, included updates to high-risk products, and updates to industry and jurisdictions risk scores. Thus, this revised Questionnaire assessed risk in line with current trends and regulatory updates relating to modern slavery. Noting some responses received this reporting period were assessed using the prior Questionnaire/risk assessment.

### **Annual Supplier Audits**

During this reporting period, the Quality Department at Fujifilm DMS continued to conduct supplier audits on various operational suppliers such as labour hire, equipment, waste management and print production suppliers. These audits aimed to assess compliance with Fujifilm DMS standards and policies relating to quality, information security, privacy, environmental sustainability, labour, human rights, modern slavery risks, corporate ethics and anti-bribery and corruption.

Audits are conducted on an ongoing basis, with annual reviews for suppliers deemed critical to Fujifilm DMS. The audit forms part of our quality management system offering insight into the safeguards implemented by suppliers and evaluating their adherence to socially responsible and ethical practices. 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.

These supplier audits are carried out in addition to the supplier Modern Slavery risk assessments to identify if there are any general risks in our operations and supply chain and will continue into the next reporting period.

### 4. Training

As part of its ongoing commitment to addressing modern slavery risks, Fujifilm DMS continues to deliver training and provide educational materials to the relevant personnel. These initiatives aim to raise awareness and provide guidance in relation to the importance of addressing Modern Slavery risks and our commitment to mitigating Modern Slavery concerns within our operations and supply chain.

### **Employee Onboarding Training**

All new employees at Fujifilm DMS undergo an onboarding program that involves mandatory interactive training for all new staff on Workplace Conduct and Performance, leave entitlements, Health and Safety, the Fujifilm DMS Anti-Bribery and Corruption policy and the Fujifilm DMS Whistleblower policy.

The onboarding process also includes 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.

#### **Annual Policies Training**

All employees of Fujifilm DMS and its subsidiaries are required to complete an annual interactive e-training on policies which includes topics on Modern Slavery, Anti-Bribery and Corruption, Whistleblowing mechanism, Discrimination, Harassment and Bullying and Grievance Procedure.

#### **Vendor Managers Training**

During this reporting period, training was provided to vendor managers and relevant internal personnel to ensure they understand modern slavery risks, relevant legislative obligations under the Australian Modern Slavery Act 2018, the requirements under Fujifilm DMS Modern Slavery Policy, and Fujifilm DMS Modern Slavery compliance processes. This ensures that the internal teams and vendor managers are equipped with the relevant information to support the Modern Slavery compliance process. In addition, this training served as a reminder for vendor managers to ensure suppliers complete Questionnaires and any associated training modules, as required.

#### **Supplier Training**

During this reporting period, online Modern Slavery Training module was provided to a mix of suppliers, some of which had either high risk scores, those with perceived high-risk scores, those in high risk industries such as labour hire and those in high risk jurisdiction such as DMSP suppliers. This training covers modern slavery, in particular, forced labour and human trafficking, by sharing definitions, case studies and guidance for recognizing such activities.



#### **Procurement Upskilling**

During this reporting period, Fujifilm DMS' Legal Department members engaged in the Modern Slavery Project continued to attend legal educational seminars in relation to Modern Slavery identification, analysis and mitigation and any legislative changes throughout this reporting period.

### 5. Grievance mechanisms and remediation

Fujifilm DMS provides accessible grievance mechanisms for all personnel, clients and suppliers to raise concerns including those relating to Modern Slavery. The Fujifilm DMS Whistleblower Policy is designed to:

- Encourage the reporting of unlawful or unethical behaviour, particularly in relation to any Modern Slavery;
- Offer guidance on how to report such concerns;
- Ensure compliance with legal obligations to protect whistleblowers; and
- Outline how Fujifilm DMS will handle the reports made.

Fujifilm DMS employees have access to the internal Whistleblower hotline, the Whistleblower Reporting Form and the reporting process and this is available on the company website. In addition, Fujifilm DMS has a Modern Slavery incident remediation strategy that sets out the steps we may take in the event we become aware of a Modern Slavery incident in our operations or supply chain. This strategy provides guidance to Fujifilm DMS in tackling any Modern Slavery incidents should one arise, and involves gathering relevant information, taking appropriate corrective actions or referring the matter to relevant parties if necessary, as well as establishing preventive measures.

# Steps Taken to Assess Effectiveness and Future Actions

Fujifilm DMS remains committed to the continuous review, assessment and enhancement of its processes to strengthen its Modern Slavery compliance framework.

To evaluate the effectiveness of its actions, Fujifilm DMS continue to liaise with vendor managers, suppliers and the SLT to identify areas for improvement. Some measures undertaken during the reporting period include:

- Held progress meetings to review the status of and progress made in relation to the ongoing Modern Slavery project based on the action items under the Modern Slavery framework;
- Reviewed the operations, supplier engagement and management processes of Fujifilm DMS;
- Considered the completion rate of the Questionnaire and strategies to maintain and improve participation in future reporting periods;
- Developed FAQ's for suppliers and vendor managers to assist with their modern slavery understanding and obligations;
- Considered the enhancements made by our third-party risk assessment software and evaluated the software's effectiveness in assessing modern slavery risk;
- Tracked whether any modern slavery related complaints were reported through the Whistleblower hotline or process; and
- Reviewed any feedback from stakeholders including suppliers and employees.

During the review process, any identified areas for improvement led to modifications of existing procedures, or introduction of new processes to address the areas of concern. The SLT was engaged as required for the Modern Slavery project and where appropriate, their involvement and support were sought to ensure compliance with the Modern Slavery policy as progress is made to the project.



Fujifilm DMS has also responded to numerous Questionnaires related to modern slavery issued by its own customers during this reporting period. These engagements provided valuable insights into customer expectations with broader industry standards regarding modern slavery compliance. Fujifilm DMS will continue to use the completion of Questionnaires to help improve our modern slavery project and related initiatives where required.

Fujifilm DMS will continue to review and improve its processes and progress its efforts towards a comprehensive and effective Modern Slavery compliance 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:

- Maintain active engagement with suppliers to continue to improve response rates to Questionnaires, particularly with high risk suppliers;
- Consider education materials that can be shared with targeted suppliers to raise awareness regarding modern slavery;
- · Complete internal processes to procure required information for supplier perceived risk assessment;
- Explore assessment strategies for suppliers who are required to publish a Modern Slavery Statement and have submitted this in place of a completed Questionnaire, which may include consultation with the software provider;
- Provide training to vendor managers to reinforce Modern Slavery compliance requirements, and to reflect any future legislative changes;
- Review and update the Modern Slavery Policy to reflect any procedural enhancements and any relevant legislative changes;
- Review and update any other relevant internal policies that may impact or assist in addressing modern slavery risks, both in Fujifilm DMS' operations and supply chain;
- Review and update the mandatory online interactive training for all employees relating to Modern Slavery, where necessary, to reflect any future legislative changes;
- Review and update the Supplier Code of Conduct as a periodic review and to reflect any changes to legislative requirements and any internal processes;
- Review and update the Modern Slavery incident remediation strategy, where necessary;
- · 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.

### 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 modern slavery project team members prior to preparing this Statement.

As part of the development of this Statement, consultation also extended to communicating with senior management personnel of 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.

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