

An aerial, high-angle photograph of a modern city, likely Tokyo, showing a dense urban landscape with numerous skyscrapers, roads, and green spaces. The lighting suggests late afternoon or early evening, with some buildings illuminated. The image is used as a background for the document cover.

Modern Slavery Statement 2020

Fuji Xerox Document Management
Solutions

FUJI xerox 

Modern Slavery Statement 2020

From our Managing Director

At Fuji Xerox Document Management Solutions (Fuji Xerox DMS), we are proud to be taking part in Australia's corporate journey to prevent and eradicate modern slavery risks in Australia and globally. We understand that there are inherent risks of modern slavery in all business operations and supply chains and are therefore committed to the education and taking steps with our employees, suppliers, and our business partners, so that together we can make a difference.

At Fuji Xerox DMS, we are actively taking part in Australia's Modern Slavery project under the guidance of the Commonwealth Government and will continue to work towards improving our strategies, processes and procedures in tackling modern slavery risks in our operations and supply chain. We understand that there may be times when we come across practices that require improvements, and therefore are committed to continuously improve our business practices and learning from the experiences of Fuji Xerox DMS and that of our corporate peers, while working together with our employees and suppliers.



Brett Matthews
Managing Director and Director of
Fuji Xerox Document Management Solutions Pty Ltd

17 November 2020

This statement was approved by the board of Fuji Xerox Document Management Solutions Pty Ltd as the parent entity for the period 1 April 2019 to 31 March 2020. The Statement was approved at the board meeting held on 17 November 2020.

This is the first Modern Slavery Statement (Statement) for Fuji Xerox Document Management Solutions Pty Ltd and its wholly owned subsidiary entities (together referred to in this Statement as Fuji Xerox DMS) for the period 1 April 2019 to 31 March 2020 (2020 or referred to as the “current reporting period” in this Statement), in accordance with the Modern Slavery Act 2018 (Cth).

Structure, Operations and Supply Chain

Structure

Fuji Xerox Document Management Solutions Pty Ltd is a company incorporated in Australia with its headquarters in Sydney, a wholly owned subsidiary of Fuji Xerox Asia Pacific Pte Ltd (FXAP), a company incorporated in Singapore. In turn, FXAP is wholly owned by Fuji Xerox Co., Ltd a company incorporated in Japan. Fujifilm Holdings Corporation is the ultimate holding company of Fuji Xerox DMS, incorporated in Japan.

Fuji Xerox DMS, being part of the FUJIFILM group of entities, our shared values comprise of six value statements, each emphasising our responsibility, our approach to business and fundamental respect for humanity.

Seek to offer exceptional value

Deliver outstanding products and services originating from market needs and social issues

Pursue innovation

Create new value based on creative thinking unfettered by preconceived ideas

Value speed

Generate results by determining the real issues before making decisions and seeking efficient processes

Collaborate closely

Seek overall optimisation and mutual development through reliance on and cooperation with others inside and outside Fuji Xerox

Maintain high ethical standards

Comply with legal and societal norms and always maintain good faith and fairness in business

Respect diversity

Respect individuals and different cultures, and live considerately alongside others as members of society

Our commitment to business conduct is set out in our Mission Statement available via the following link: <https://www.fujixerox.com/eng/company/profile/philosophy>

Our Japan based headquarters, Fuji Xerox Co Ltd has been a member of the United Nations Global Compact since 2002 and has cemented this commitment through its subsidiary businesses, to support the ten principles to address human rights, labour rights, environmental initiatives, anti-corruption and the fight against slavery in supply chains. Our ultimate parent company, FUJIFILM Holdings Corporation published the FUJIFILM Group Human Rights Statement in June 2018 (revised in April 2019), applicable to all personnel in the FUJIFILM group and the related business in the United Kingdom (UK), FUJIFILM UK Limited has published its UK Modern Slavery Statement in line with the UK legislation.

At the end of the current reporting period (current reporting period being 1 April 2019 to 31 March 2020), Fuji Xerox DMS had the following subsidiary entities within its corporate group in Australia, Fuji Xerox BusinessForce Pty Ltd, HPAL Ltd, Hermes Precisa Pty Ltd and A.C.N. 133 915 321 Pty Ltd and a subsidiary entity in the Philippines, FXDMS Philippines, Inc. (FXDMSP), which this Statement covers. FXDMSP operates to provide IT support services to Fuji Xerox DMS entities in Australia. Fuji Xerox DMS entities have shared management teams, corporate functions, key policies and processes, hence have prepared a joint statement.

Fuji Xerox Australia Pty Ltd and its subsidiary entities in Australia (FXA), together with Fuji Xerox DMS share the same holding entity (FXAP), also the ultimate parent entity of FUJIFILM Holdings Corporation and are together part of the FUJIFILM Corporate Group. However the two groups of entities are unique to each other and operate separately. The services and product offerings of the two groups of entities, its policies and procedures, supply chains, the local management teams and the risks relating to each group of entities differ. Therefore Fuji Xerox DMS and FXA prepared a separate Modern Slavery Statement. This Statement covers Fuji Xerox DMS group of entities.

Operations

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

At the end of the reporting period, Fuji Xerox DMS had approximately 1005 employees across various sites in Australia that includes offices, operational sites and warehouses and approximately 138 employees in the Philippines. The Fuji Xerox DMS business divisions consist of: Information Technology/ Technical and Professional Services (TaPS), Finance, Legal, Sales and Marketing, each state Operations, Quality and Human Resources.

Supply Chain

The Fuji Xerox DMS supply chain entails the following key sectors, which includes products and/or services in the relevant sectors:

- Labour Hire and Recruitment suppliers)
- Security
- Postal and Courier Services
- Stock and printing suppliers
- IT Suppliers (equipment and services)
- Telecommunication Services
- Machine/Machine maintenance
- Catering
- Clothing/textiles (includes uniform
- Building management and maintenance
- Property
- Consulting
- Electricity
- Financial Services
- Furniture Rental
- Individual Contractors
- Office Stationery
- Gym/Health and Fitness
- Furniture Rental
- Financial Services
- Electricity
- Consultancy Services
- Travel Management Services

Based on the 2020 Fuji Xerox DMS Supplier Modern Slavery Questionnaire (2020 Questionnaires) and related responses received from the suppliers, Fuji Xerox DMS identified that its key and higher risk suppliers assessed have operations in the following countries:

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

With many of the Fuji Xerox DMS direct suppliers being Australian entities, having registered offices in Australia and with local operations.

Fuji Xerox DMS will continue to work with our suppliers to further analyse the suppliers, sectors, their extended supply chains and the source or origin of raw materials that may be present in our supply chains to try and identify and address modern slavery risks that may be present in our supply chains.

Risks of Modern Slavery Practices in the Operations and Supply Chains

During the current reporting period, Fuji Xerox DMS has considered and assessed the modern slavery risks that it may possibly cause, contribute and/or be directly linked to via its operations and supply chains, in accordance with the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities. In particular, we considered risk factors such as sector, industry, types of products and services, and geographic risks.

Operations

During the current reporting period, Fuji Xerox DMS was unable to identify any instances of modern slavery practices within our operations. However identified that the use of labour hire agencies for extra staffing support purposes in its operations and the presence of the operation in the Philippines increased the risk of modern slavery practices appearing in our operations. For the current reporting period, it has been assessed via operational risk assessment that there were controls in place within Fuji Xerox DMS to keep this risk low.

Supply Chain

During the current reporting period, although Fuji Xerox DMS has not seen any direct evidence of modern slavery practices in our supply chain, we are aware that there are products and services we employ in our supply chain that are at a higher risk of being connected to modern slavery practices.

Through undertaking a study of our supply chains and assessing their risks in relation to modern slavery, Fuji Xerox DMS identified the following products and services that are of a higher risk to being produced from or having connection with modern slavery practices:

- Security
- Couriers
- Equipment and stock
- Paper
- Computers
- Mobile phones
- Machine maintenance
- Catering
- Uniform textile suppliers
- Building management and maintenance (includes but not limited to cleaning, waste disposal, construction and maintenance work)

Based on the 2020 Questionnaire responses received from the suppliers, we were able to determine that some of our suppliers have operations in countries including Bangladesh, Brazil, China, India, Indonesia, Malaysia, Philippines and Vietnam which are countries with higher geographic risk of modern slavery (based on the 2018 Global Slavery Index of Walk Free Foundation). Some of these suppliers mitigate the risk of modern slavery through implementation of processes and procedures such as audit mechanisms, implementation of policies to prohibit the use of forced labour and human trafficking in their supply chain, including the supplier code of conduct and more. In the current reporting period, none of our suppliers who responded to our 2020 Questionnaire reported any known modern slavery in their operations.

We also acknowledge that the suppliers to Fuji Xerox DMS Philippines operations have an increased geographic risk of modern slavery practices. 2020 Questionnaires were also sent out to these suppliers. Although the response rates to the 2020 Questionnaires were not as high as the suppliers to Fuji Xerox DMS Australian operations, we will continue to work with our Philippines Vendor Managers and suppliers to make further progress in this area.

Although we understand that Covid-19 may have placed an increased strain on our suppliers that could increase the risk of modern slavery practices occurring, during the current reporting period which ended on 31 March 2020, we had not been able to notice an obvious increased risk. Covid-19s impact will be further considered in our next statement.

Actions Taken to Assess and Address Modern Slavery Risks

Assessment

During the current reporting period, Fuji Xerox DMS has undertaken risk assessments of its operations and supply chains to assess its susceptibility to modern slavery practices, assessing the potential for Fuji Xerox DMS to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.

As part of this process, Fuji Xerox DMS assessed how Fuji Xerox DMS current policies and practices acted to address the risk of modern slavery in its operations and supply chain.

Fuji Xerox DMS also developed a 2020 Questionnaire which was sent out to its suppliers that were assessed as higher risk and also those whom contributed to significant part of its supply chain by monetary value, after financial assessment of its suppliers by their spend value had been conducted. The 2020 Questionnaire focused on modern slavery risks as provided in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities in particular by:

- sector
- industry
- types of products and services and
- geographic risks.

Unfortunately not all the suppliers targeted to complete the 2020 Questionnaire responded. Some suppliers provided their own modern slavery policies and statements in lieu of completing the 2020 Questionnaire, from which Fuji Xerox DMS was able to undertake the relevant assessment.

For the 2021 reporting period (period of 1 April 2020 to 30 March 2021), Fuji Xerox DMS updated its Supplier Modern Slavery Questionnaire, which the details will be reported in the next statement.

Actions taken

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

Fuji Xerox DMS maintains stringent processes in on-boarding and managing engagement of employees and staff that reduces the risks of modern slavery practices being present in our operations, to ensure their right to work in the relevant country as well as being subject to a satisfactory reference checks. These processes and procedures assist in Fuji Xerox DMS having control measures in place to mitigate the risks of its employees and staff being the subject of modern slavery, such as the practices of debt bondage.

During the current reporting period:

- At Fuji Xerox DMS, we formed a Modern Slavery Task Force (Task Force) to kick start the modern slavery project and related initiatives (Modern Slavery Project), with the full support of our Managing Director and the Senior Leadership Team (SLT). The Task Force members include the SLT (including the Managing Director), members of the Legal Department, Finance Department and the Vendor Managers from each business group within Fuji Xerox DMS. The Task Force members were provided with refresher Legal update on the Australia’s Modern Slavery Act 2018 (Cth) that was sent to Fuji Xerox DMS’ board and to the SLT and to their respective teams in early 2019. The members of the Task Force are the key drivers of the Modern Slavery Project at Fuji Xerox DMS, as they engage directly with our suppliers, are involved in the day to day management of our operations and are supported by the Legal, Finance and Quality Departments.
- We updated our “Doing the Right Thing- Whistleblower Policy” (Whistleblower Policy), to allow employees, suppliers and contractors to confidentially and with the option to anonymously raise concerns, including those that may relate to modern slavery or human trafficking in a number of ways, including by email, post or via a Whistleblower Hotline.

The whistleblowing process under the Whistleblower Policy can be an effective grievance mechanism to those that come across or are impacted by modern slavery related issues and risks at Fuji Xerox DMS in line with the United Nations Guiding Principles on Business and Human Rights (principles 22 and 31) and can also be an effective form of a remediation process as it is:

- Legitimate
- Accessible
- Predictable
- Equitable and
- Transparent

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

- The Fuji Xerox DMS supplier agreement template was updated to include a dedicated modern slavery clause, requiring suppliers to take active steps towards ensuring their operations and supply chains are free from modern slavery and to mitigate such risks.
- The Fuji Xerox DMS suppliers are also provided with our Supplier Code of Conduct which sets out our commitment and expectations of our suppliers in the areas of Corporate Social Responsibility and Ethical Procurement, including the Environment and Human Rights and Labour issues. The Fuji Xerox DMS Supplier Code of Conduct has been updated to include a section relating to supplier’s commitment towards prevention of modern slavery in its operations and its supply chains.
- Fuji Xerox DMS requires labour hire companies that it engages as its supplier to comply with all applicable legislative requirements and licencing regimes. During the reporting period, the Fuji Xerox DMS Labour Hire Services Agreement template was updated to include a dedicated modern slavery clause, requiring labour hire companies to take active steps towards ensuring their operations and supply chains are free from modern slavery and to mitigate such risks.
- Although Fuji Xerox DMS was unable to identify any modern slavery practices in our operations or our supply chain, given it is a potential risk for all businesses, we developed a Modern Slavery Remediation Process template for circumstances where we may come across issues or risks associated with modern slavery within our operations (for Fuji Xerox DMS - an Internal version) or in our supply chains (a version for Suppliers). The two processes (Internal and a Supplier version) are different, however both processes have been prepared with the interests of “at risk” individual(s) prioritised.
- We commenced development of Modern Slavery Policy and Training. Further details of its completion and release within Fuji Xerox DMS will be provided in our next statement.

Assessing the Effectiveness of Our Actions

- Regular progress meetings are held to review the status of and progress made in relation to the ongoing Modern Slavery Project. During the review process, if there are identification of areas requiring improvement, existing processes are either modified, replaced and/or new process added to the existing process to try and address the issue. This is an ongoing process, to maximise the effectiveness of the Modern Slavery Project and to continuously make improvements in the areas where it is needed.
- Regular updates in relation to the Modern Slavery Project are provided to the Senior Leadership Team and where necessary, active participation and assistance is requested and expected of the Senior Leadership Team, to ensure the project does not lose focus, momentum and the actions taken are effective.
- Responses from the suppliers in relation to the issues of modern slavery, including the Questionnaire responses are monitored, tracked and analysed. Where necessary, follow-up communication and requests are sent to the relevant supplier. This process shows a level of trend across the Fuji Xerox DMS suppliers that potentially relate to Modern Slavery related risks and assists Fuji Xerox DMS to plan and to implement updates and improvement procedures and processes as required.
- Continuation of review of existing policies, procedure and practices to ensure it aligns with the recommended practices relating to mitigating modern slavery risks whether in its operations or supply chains. During this process where there were areas identified as requiring an update and/or improvement, implementing or working towards implementing these.
- Audit of the Fuji Xerox DMS internal processes and procedures against existing policy framework relating to supplier engagements and relationships. During this process where there were areas identified requiring an update and/or improvement, to implement or to work towards implementing these.

Future Commitments

At Fuji Xerox DMS, we are committed to the continuous review of our plans, policies, processes, procedures and activities, where necessary making updates in areas identified as requiring improvements and/or updates, following up and tracking progress of any areas identified as areas of risk or potential risk. Fuji Xerox DMS see this as key to the successful outcome of this Modern Slavery Project, which will be an ongoing and an important part of our business.

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