

FUJIFILM Data Management Solutions

Modern  
Slavery  
Statement  
**2024**



## From our Managing Director

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

Modern slavery is an unfortunate reality in today’s society, affecting an estimated 50 million people around the world. Taking various forms such as forced labour, debt bondage, human trafficking, slavery-like practices and exploitation of children, modern slavery is usually hidden from plain sight, and easily forgotten. It is imperative for us to understand that modern slavery can be present in the supply chain of the products or the services we engage in every day. As a reputable organisation in Australia, we believe we have the obligation to play a part in combatting modern slavery in our business operation and supply chain.

To address the modern slavery concerns, we have established frameworks and implemented various strategies to prevent, identify and address modern slavery risks in our operations and supply chain. This includes establishment of policies, conducting ongoing due diligence, training of the relevant personnel and setting up grievance mechanisms.

In this reporting period, we have also engaged a new third-party risk assessment software to improve our processes in conducting the modern slavery risk assessment of our suppliers. We will continue to raise awareness on all forms of modern slavery through active engagement of our employees, suppliers and business partners to identify and manage modern slavery risks and instil respect for human rights. We will continue to stay vigilant and strengthen our procedures to address any upcoming changes to the law and remain committed to continuously improve our framework and measures to prevent and eradicate modern slavery and modern slavery risks in our business operations and supply chains.

### 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 2023 to 31 March 2024. This Statement was approved at the board meeting held on 23 July 2024.

#### 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

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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.

<b>Mandatory criteria</b>	<b>Page number/s</b>
<b>Section a)</b> Identify the reporting entity.	4
<b>Section b)</b> Describe the reporting entity's structure, operations and supply chains.	4 - 9
<b>Section c)</b> 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 - 12
<b>Section d)</b> 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.	13 - 19
<b>Section e)</b> Describe how the reporting entity assesses the effectiveness of these actions.	20
<b>Section f)</b> 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).	21
<b>Section g)</b> Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<b>Case Study:</b> 17

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# Reporting Entities and Reporting Period

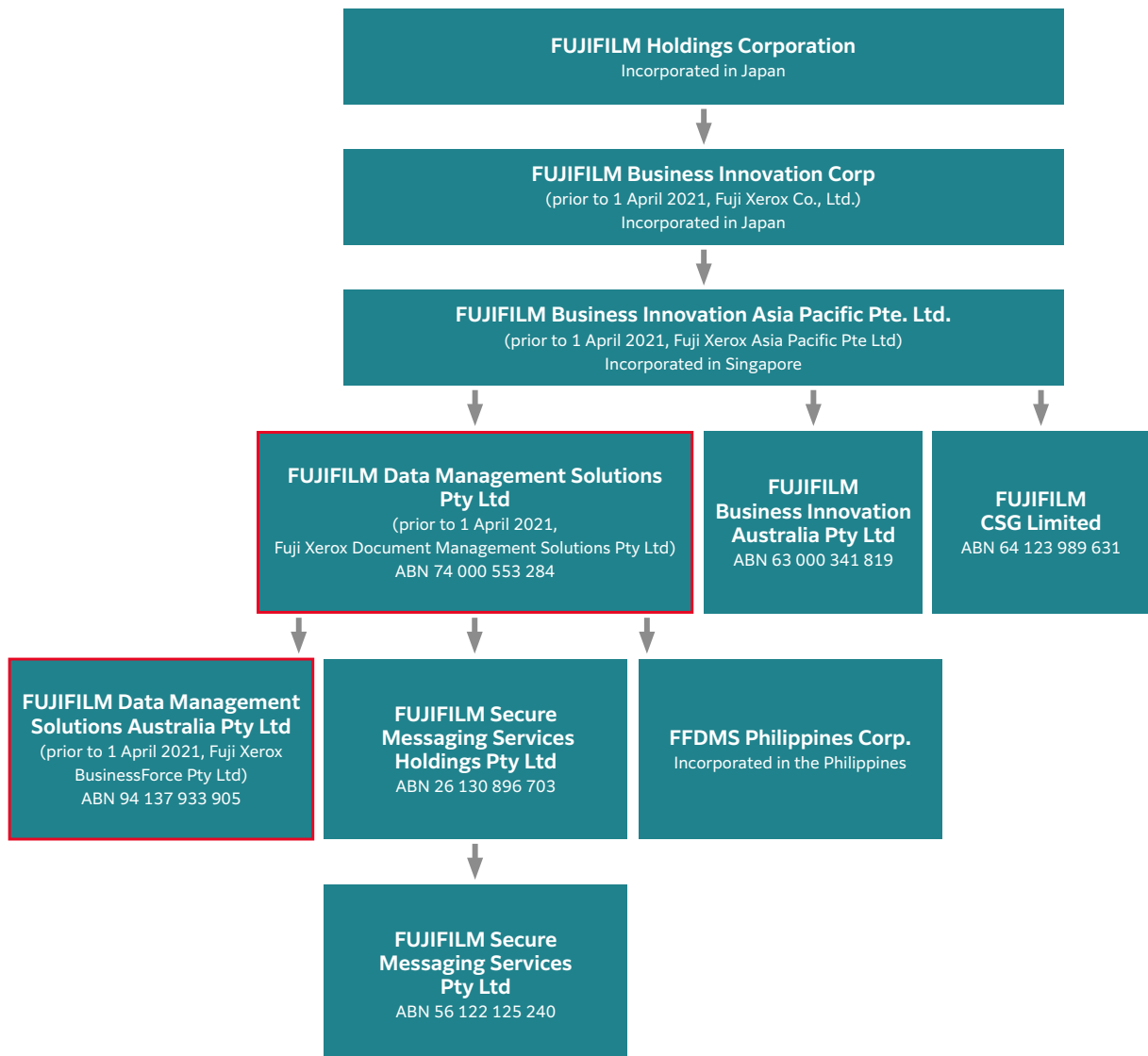
FUJIFILM Data Management Solutions Pty Ltd (“**FUJIFILM Data Management Solutions**”) and FUJIFILM Data Management Solutions Australia Pty Ltd (“**FUJIFILM Data Management Solutions Australia**”) are the reporting entities under the Modern Slavery Act. This Statement is the fifth statement for FUJIFILM 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 2023 and ending on 31 March 2024 (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.

## 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 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, 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 sounder 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. DMSP in the Philippines provides an integral back-office Information Technology/Technology and Professional Services (“**TaPs**”) support function for Fujifilm DMS’ operations. FBSMS supports Fujifilm DMS’ operations and provides business SMS gateway services to the customers. 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 830 employees across 9 sites in Australia including offices and operations sites and it has approximately 140 employees located at its Manila, Philippines offices. FBSMS had approximately 5 employees in Australia. Fujifilm DMS’ business divisions consist of a number of different departments: TaPS, Finance, Legal, Sales and Marketing along with relevant state’s own Operations, Quality and Human Resources.



# Fujifilm DMS Supply Chain

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

- a) 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;
- b) 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

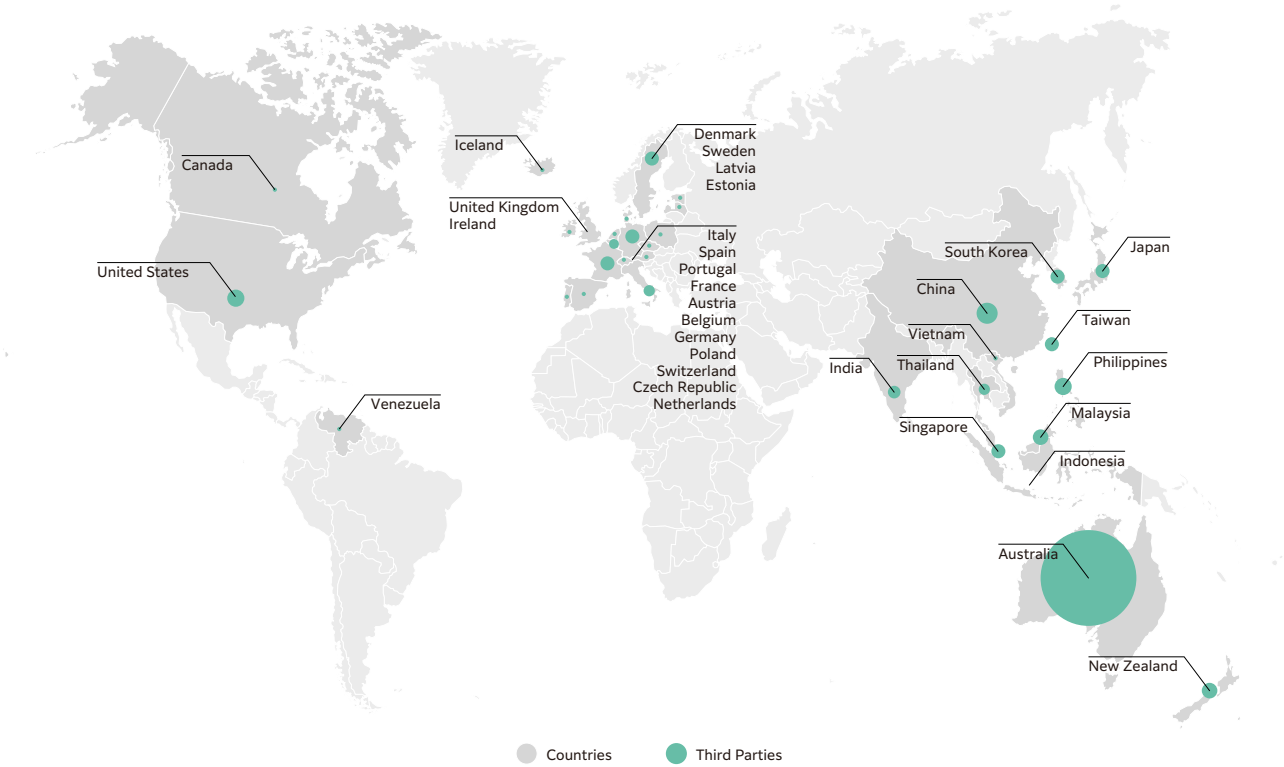


Professional Services



The majority of Fujifilm DMS' direct suppliers are 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, Fujifilm DMS identified 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 used the third party software to map its Tier 1 and Tier 2 and beyond suppliers and the countries of their operation as per below.

### Third Party Business Operations



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 IT and telecommunications service providers. 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 DMSP's suppliers are based overseas due to its operations in the Philippines.

# Risks

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

During this reporting period, Fujifilm DMS has continued to identify and analyse the potential Modern Slavery risks in Fujifilm DMS' operations and supply chains. For our risk assessment, Fujifilm DMS considered the risk factors from the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (Guidelines) Appendix 1 Table 6, namely sector and industry risk, geographic risk, product and services risk, and entity risks, to identify and analyse the potential risks in our operations and supply chain. During the reporting period, no actual instances of Modern Slavery practices were reported or identified in our operations and supply chain.

### Examples of risk indicators

<b>Industry Risks</b>	<ul style="list-style-type: none"> <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> </ul>
<b>Supply Risks</b>	<ul style="list-style-type: none"> <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>
<b>Geographic Risks</b>	<ul style="list-style-type: none"> <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> </ul>
<b>Entity Risks</b>	<ul style="list-style-type: none"> <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>

## Potential Risks of Modern Slavery Practices in Operations

As part of the Modern Slavery Policy and procedure, Fujifilm DMS conducted the annual review to determine the risk of Modern Slavery within its own operations. The review included examination of the operations and liaising with other business departments to identify and analyse any potential risks of Modern Slavery in the operations. As reported in the last reporting period, 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. Along with various measures put in place to combat the risks arising from the use of labour hire agencies (such as induction 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), the risks have been appropriately managed. Further details of the actions taken is addressed in the later part of this statement.

## Potential Risks of Modern Slavery Practices in Supply Chain

Under this reporting period, Fujifilm DMS identified and analysed industry and geographic risks of Modern Slavery in its supply chain.

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

Fujifilm DMS also undertook an analysis of its top suppliers based on spend and its top suppliers provided goods and services such as delivery and postage service, print supplies (includes paper, machinery, equipment, envelopes, stationery and ink), labour hire recruitment service, IT consulting and property leasing, with the vast majority of these being based in and operating in Australia with several suppliers based in Belgium, Canada, Estonia, Japan, India, Ireland, Netherlands, New Zealand, Singapore, Switzerland, Taiwan, United Kingdom, United States and Germany. Additionally, it has been identified that its top 10 spend suppliers are based in Australia.

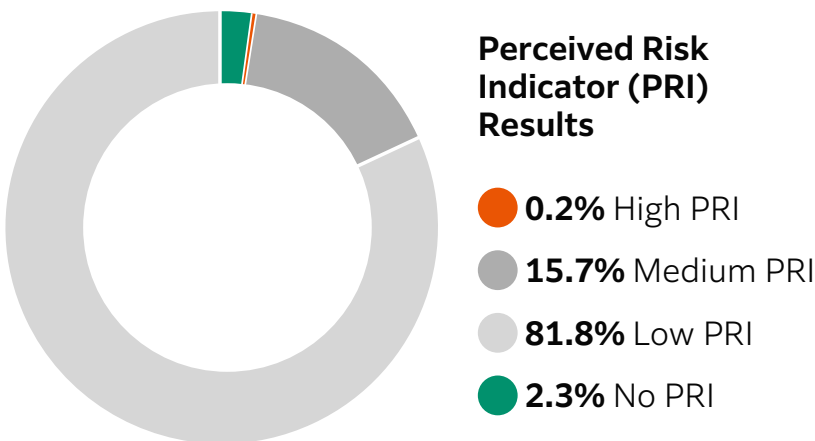
Similarly, Fujifilm DMS has continued to map out its supply chain's geographical links as a means of determining associated Modern Slavery risks as shown in the earlier section of this statement. To determine the geographical risks, Fujifilm DMS examined the prevalence of Modern Slavery ranking that has been attributed to each of the countries in the Global Slavery Index Report 2023 published by Walk Free (Walk Free is an international human rights group focused on the eradication of modern slavery in all its form) which is a ranking out of 160 countries, with the higher the ranking meaning the lower the prevalence of Modern Slavery.

The column on the right sets out the countries that Fujifilm DMS and its subsidiaries' Tier 1 and its 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):

In many transactions for this reporting period, most of the Fujifilm DMS suppliers were Australian registered entities of a multinational group headquartered in the US, Japan or another country with a high index ranking or small to medium sized Australian companies. This is similar for FBSMS, whereby, the large international corporations engaged by FBSMS are usually the Australian registered entities of multinational companies. Majority of FBSMS' suppliers are based in Australia which indicates lower 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 36th for prevalence on the Global Slavery Index Report 2023, the direct suppliers of DMSP may be exposed to higher inherent risks of Modern Slavery due to the country in which they operate in. However, with the assistance of the new software and the updated modern slavery risk assessment and trainings, the modern slavery risks in the supply chain in the Philippines have been further managed. Additional information on the actions taken are described in the subsequent section.

Overall, with the assistance of the new third-party risk assessment software, the risk rating of each supplier was generated based on location risk, industry risk and general media monitoring of adverse risk areas. The following chart shows the general risk ratings of the Fujifilm DMS (including DMSP and FBSMS) suppliers which shows that the majority of the suppliers have a lower risk profile.



## Countries where Fujifilm 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)
- Czech Republic (102/160)
- Poland (80/160)
- Thailand (79/160)
- Malaysia (72/160)
- Indonesia (62/160)
- Philippines (36/160)
- India (34/160)
- Venezuela (24/160)

# 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. Policies
2. Due Diligence
3. Training
4. Governance and the role of the teams
5. Grievance mechanisms and remediation

### 1. Policies

Our policies and procedures provide rules and guidance on how Fujifilm DMS (including FBSMS and DMSP) manages risks and how we engage with our personnel and suppliers in relation to issues such as modern slavery. Following table lists some of the key policies, procedures and documents that underpins our compliance process relating to modern slavery.

Policy, procedure or document	Details on how the policy, procedure or document supports the Modern Slavery compliance activities
<p><b>Modern Slavery Statement</b></p>	<p>Fujifilm DMS has been publishing the Modern Slavery Statement on the Australian government's Modern Slavery Statement registry. The statement details the procedure and the activities conducted in each financial year to ensure compliance with the Australian Modern Slavery Act 2018. The Modern Slavery Statement is published on our website.</p>
<p><b>Modern Slavery Policy</b></p>	<p>During this reporting period, Fujifilm DMS reviewed and where necessary, updated its Modern Slavery Policy to ensure compliance with the Modern Slavery Act 2018 and to align with our new procedures arising from the adoption and implementation of the new third-party risk assessment software. The current 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. The policy applies to all employees working in Fujifilm DMS' operations and endeavours to cover every aspect of Fujifilm DMS supply chain. A copy of the policy is issued to all vendor managers of FBSMS and DMSP which can also be found in the Fujifilm DMS staff intranet.</p> <p>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.</p>

## Policy, procedure or document

## Details on how the policy, procedure or document supports the Modern Slavery compliance activities

### Supplier Code of Conduct

The Supplier Code of Conduct sets out Fujifilm DMS' commitment towards ethical procurement practices. It includes a section on modern slavery where we request that suppliers recognise the serious consequence of not respecting Human Rights and fair labour practices and to oppose all forms of modern slavery within the suppliers' operation and supply chain. The Supplier Code of Conduct is provided to our suppliers during onboarding and with the Modern Slavery Questionnaire.

The Supplier Code of Conduct is reviewed annually, and any updates are made if necessary.

### Template Supplier Contractual Terms & Condition

Our template Supplier Contractual Terms & Conditions include a clause on Modern Slavery where we require our suppliers and its subcontractors to take reasonable steps to prevent Modern Slavery in their operations and supply chain. It also includes the requirement to immediately notify Fujifilm DMS in the event of any case of Modern Slavery in its operation or supply chain. We may also request for a report detailing steps taken by the supplier to prevent Modern Slavery in their operations and supply chain.

## 2. Due Diligence

### Onboarding a third-party risk assessment platform

During this reporting period, Fujifilm DMS engaged the third-party risk assessment platform to automate the supplier onboarding, risk assessment, due diligence and issuing of Modern Slavery Questionnaire processes. Throughout the reporting period, Fujifilm DMS designed and implemented an automated process of issuing Modern Slavery Questionnaires to its suppliers, conducting risk assessment, due diligence and media monitoring. To educate the relevant personnel on the new process implementation, Fujifilm DMS conducted an internal information session to provide a refresher training on the topic of Modern Slavery and to provide update on the adjustments made to the existing Modern Slavery compliance procedures.

With the integration of the third-party platform, Fujifilm DMS will continue to review and work on improving 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 periodically the effectiveness of the third-party software in managing the Modern Slavery risks in our operations and supply chain.

## Supplier Risk Assessment

In addition to the new suppliers onboarded in current reporting period, Fujifilm DMS continued to assess the risks of the suppliers who were engaged previously and continued to be Fujifilm DMS suppliers during this reporting period. With the implementation of the new software in our processes, the following tasks were conducted as part of the supplier risk assessment procedure:

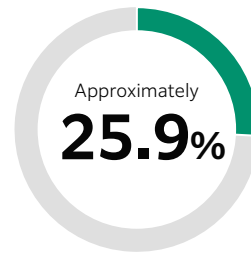
<b>General Risk Rating</b>	Automated risk rating was generated for each of the suppliers based on the industry and geographical risks using third-party information bureaus and media monitoring in the adverse risk areas.
<b>Modern Slavery Questionnaire</b>	New Modern Slavery Questionnaire was sent to all new and existing suppliers (excluding intercompany and government agencies) of Fujifilm DMS and its subsidiaries who have not responded to our questionnaires in the past 12 months. The new suppliers will receive a Modern Slavery Questionnaire and the Supplier Code of Conduct during onboarding.
<b>Risk Rating for the Modern Slavery Questionnaire</b>	Automated risk rating was generated for the Modern Slavery 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.
<b>Manual risk assessment of Modern Slavery Questionnaire</b>	During this transition period of implementation of the software, we have also accepted the completed manual Modern Slavery Questionnaires which were sent to the suppliers in the past, for which we have conducted manual screening of the suppliers.
<b>Follow up Activities</b>	With the assistance of the software and the Fujifilm DMS' vendor managers, we continued to follow up with those non-responsive and partially responded suppliers to ensure that the Modern Slavery Questionnaires were eventually completed or supplemented for our risk assessment and risk mitigation purposes. 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 conducted risk assessment on that supplier using the information that was made 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. If the supplier has been assessed to be in higher risk category, additional desktop screening (involving assessment of publicly available resources such as Modern Slavery Statement) was conducted.

With the above processes, we endeavoured to capture the suppliers of Fujifilm DMS and its subsidiaries to conduct the Modern Slavery risk assessment.

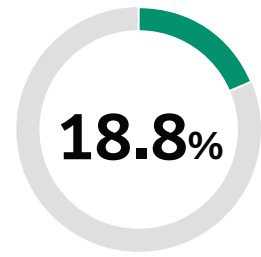
## Results from the Modern Slavery Questionnaire

Approximately 25.9% Fujifilm DMS suppliers (including those of its subsidiaries) responded in the current reporting period to the Modern Slavery Questionnaire. About 18.8% of the suppliers that responded within this reporting period were entities that were required to report or voluntarily reported under the Modern Slavery Act.

There were varied and mixed number of processes and measures from supplier to supplier to mitigate Modern Slavery risks in their supply chain and within their own organisation. Examples included implementation of a Modern Slavery policy and policies to protect the health, safety and security of their personnel, having a formal hiring or recruitment process, conducting education and training of staff on the risks of Modern Slavery, having a whistleblowing process in place, carrying out periodic supplier audits and conducting supply chain risk assessment by sending out self-assessment questionnaires to gain a better understanding of their supply chain. In this reporting period, out of the questionnaires assessed, approximately 10.5% of Fujifilm DMS' supply chain consisted of higher risk suppliers, 39.8% medium risk suppliers and 49.8% low risk suppliers.



of Fujifilm DMS suppliers (including those of its subsidiaries) responded in the current reporting period to the Modern Slavery Questionnaire.



of respondents that responded were entities that were required to report or voluntarily reported under the Modern Slavery Act.



### Fujifilm DMS supplier risk ratings

- 10.5% High risk
- 39.8% Medium risk
- 49.8% Low risk

Possibly due to the staffing shortages in the current labour market, resourcing issues and a lack of awareness of Modern Slavery risks and the related regulatory requirement in relevant jurisdiction, we are yet to receive responses from a high number of suppliers to whom the questionnaires were sent to. Fujifilm DMS will continue to work with its vendor managers to improve on the engagement of suppliers to effectively manage the risks of Modern Slavery in each supply chain. Fujifilm DMS will also continue to assess the effectiveness of its Modern Slavery Questionnaire and the new third-party risk assessment platform along with the response rate and the quality of responses to determine and implement further modifications or improvements that may improve our vendor engagement processes. Any necessary, additional support and assistance will be provided to the suppliers to raise awareness on the various forms of Modern Slavery and emphasise the importance of implementing internal processes to identify and mitigate the risks of Modern Slavery in their operation and supply chain.

## 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. These annual supplier audits are performed in addition to the supplier Modern Slavery risk assessments described above to identify if there are any general risks in its operations and will be continued 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 the suppliers and whether the 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.



# Case Study:

## Due diligence on Labour hire agencies

Due to the nature of the services provided by Fujifilm DMS, several labour hire agencies were engaged in this reporting period. Our supplier screening and risk assessments have shown that most of these labour hire agencies had lower modern slavery risks as they usually had additional systems and processes in place to address Modern Slavery concerns in their operations and supply chain. Most agencies whom Fujifilm DMS engaged had policies and procedures to address various modern slavery and human rights concerns and to provide grievance or whistleblowing mechanisms for the employees to raise concerns. Many of the labour hire agencies engaged had trainings to educate the workforce on health and safety at work and human rights issues.

Fujifilm DMS continues to ensure that it maintains stringent standards amongst its labour hire suppliers and it has taken measures to include requirements 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 99 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.

### 3. Training

As part of the Modern Slavery compliance program, Fujifilm DMS provides trainings and educational materials to the relevant personnel to educate and provide guidance in relation to the importance of addressing Modern Slavery risks and our commitment towards mitigating Modern Slavery concerns in the operations and supply chain.

#### Employee Onboarding Training

Fujifilm DMS has an employee onboarding process 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

Fujifilm DMS requires all employees of Fujifilm DMS and its subsidiaries 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

Additionally, periodic vendor managers' training is provided to ensure the vendor managers understand what modern slavery risks are, understand the requirements under Fujifilm DMS Modern Slavery Policy, requirements under the legislation and understand Fujifilm DMS Modern Slavery compliance processes so that they are equipped with the relevant information to support vendor management and the Modern Slavery compliance process.

In this reporting period, we have conducted a vendor managers' Modern Slavery training to educate the vendor managers and relevant internal personnel on what is Modern Slavery, requirements under the Australian Modern Slavery Act 2018, our commitment towards addressing Modern Slavery concerns and the changes to the Modern Slavery compliance framework and procedure with the onboarding of the new third-party software.

#### Supplier Training

As a new initiative in this reporting period, online Modern Slavery Training module was provided to our suppliers that were determined as high risk based on the response provided for the Modern Slavery Questionnaire.

#### Procurement Upskilling

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



## 4. Governance and the role of the teams

### Fujifilm DMS Modern Slavery Task Force (“Task Force”)

The Task Force was formed in 2019 and continues to drive the Fujifilm DMS’ Modern Slavery project and related initiatives with the support of Fujifilm DMS’ Managing Director and the Senior Leadership Team (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 vital role in carrying out the Fujifilm DMS’ Modern Slavery compliance activities and ensuring the reporting obligations are being met within its operations and supply chain. In order to reduce the risk of Modern Slavery practices in its operations, Fujifilm DMS maintains and enforces procedures and 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 where relevant, additional probity checks.

## 5. Grievance mechanisms and remediation

At Fujifilm DMS, all personnel, clients and suppliers have access to grievance mechanisms to raise concerns including matters relating to Modern Slavery. Fujifilm DMS has Fujifilm DMS Whistleblower Policy to:

- Encourage the reporting of unlawful and unethical behaviour, especially in relation to any Modern Slavery concerns;
- Provide guidance on a process to enable such reporting;
- Ensure that Fujifilm DMS complies with its obligations to protect the reporting of such behaviour; and
- Outline how Fujifilm DMS will handle the reports made.

The employees of Fujifilm DMS have access to the internal Whistleblower hotline. The Whistleblower Reporting Form and the reporting process are also outlined on our website. Additionally, 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 operation or supply chain. This strategy provides guidance to the Task Force in tackling any Modern Slavery incidents should one arise, that involves information gathering, taking appropriate corrective actions or referring the matter to relevant parties if necessary and establishing prevention mechanisms.



# 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. To assess the effectiveness of our Modern Slavery project and our compliance framework, Fujifilm DMS:

- 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 attendance and completion rate of the training provided to the staff of Fujifilm DMS and its subsidiaries;
- considered the completion rate of the Modern Slavery Questionnaire;
- monitored whether any modern slavery related complaints were reported through the Whistleblower hotline; and
- reviewed any feedback from suppliers, employees or other stakeholders.

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 areas of concern. 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 is effectively followed and complied with.

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.

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:

- 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 and any future updates to the Modern Slavery laws, where necessary;
- 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;
- 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

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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.