



FUJIFILM Data Management Solutions

Modern Slavery Statement **2022**

FUJIFILM



From our Managing Director

This is FUJIFILM Data Management Solutions Pty Ltd's and FUJIFILM Data Management Solutions Australia Pty Ltd's third joint Modern Slavery Statement ("**Statement**") under the *Modern Slavery Act 2018* (Cth) ("**Modern Slavery Act**"). It sets out the actions and assessments undertaken by us, in conjunction with our employees and suppliers, to prevent and eradicate modern slavery and modern slavery risks in our business operations and supply chains within Australia and also globally.

Modern Slavery is a global problem and we understand that we each have a part to play in tackling this problem. With each statement, we have improved and enhanced our modern slavery efforts by identifying areas of improvement and by addressing and minimising the risks of modern slavery in our business operations and throughout our supply chains. We continue to strive to improve our commitment in raising and maintaining awareness about all forms of modern slavery by proactively engaging with our employees, suppliers and business partners to identify and manage modern slavery risks and instil a respect for human rights. This Statement sets out our ongoing efforts to assess and address modern slavery and what we have done in working towards eradicating it.

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 2021 to 31 March 2022. This Statement was approved at the board meeting held on 8 July 2022.

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.

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

Brett Matthews

Responsible Member

Managing Director of FUJIFILM Data Management Solutions Pty Ltd

Mandatory Criteria

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

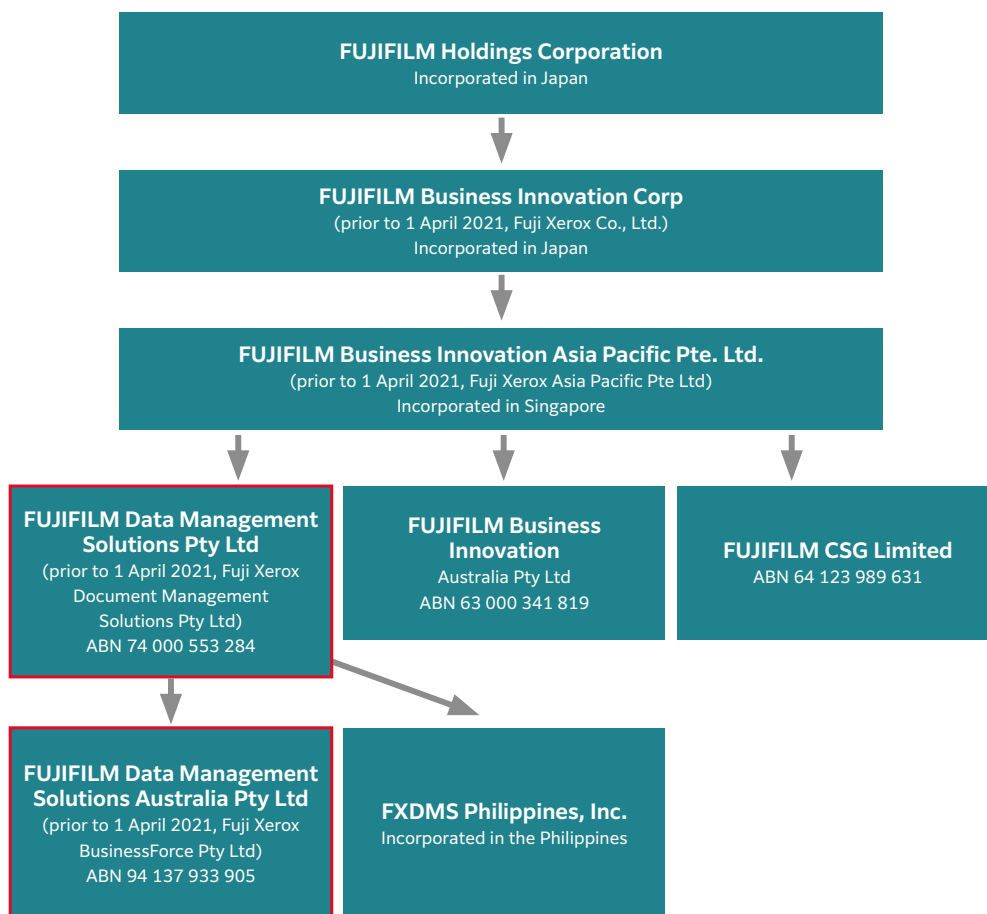
Mandatory criteria	Page number/s
Section a) Identify the reporting entity.	4
Section b) Describe the reporting entity's structure, operations and supply chains.	6 - 9
Section c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	12 - 14
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.	16 - 22
Section e) Describe how the reporting entity assesses the effectiveness of these actions.	23
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).	24
Section g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Case Studies: 10 - 11 COVID-19 Impacts: 15

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 third 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 2021 and ending on 31 March 2022 (referred to as the “**reporting period**” in this Statement), prepared in accordance with the Modern Slavery Act. In this Statement, references to “**Modern Slavery**” refers to Modern Slavery as defined under the Modern Slavery Act.

Group Structure

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



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

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

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

Fujifilm DMS entities have shared management teams, corporate functions, key policies and processes. Therefore, a joint statement in accordance with s14 of the Modern Slavery Act has been prepared for this reporting period.

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

However, these two sister companies are unique to each other and operate separately from 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 Modern Slavery risks relating to these entities differ to that of Fujifilm DMS. Therefore, Fujifilm DMS has prepared a separate statement to these entities.



Fujifilm DMS Operations

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

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Multi-channel communications and services



Large-scale document and data management



Print communication solutions



Digital online communication solutions

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

At the end of this reporting period, Fujifilm DMS had approximately 887 employees across 9 sites in Australia including offices and operations sites and it had approximately 134 employees located at its Manila, Philippines offices. Fujifilm DMS’ business divisions consist of a number of different departments being: TaPS, Finance, Legal, Sales and Marketing along with each state’s own Operations, Quality and Human Resources.



887

Employees across 9 sites



134

Employees located in Manila

Fujifilm DMS Supply Chain

Fujifilm DMS utilises a wide variety goods and services within its immediate supply chain with services ranging from professional and consulting services for tax, auditing, IT and cybersecurity to on-site services such as cleaning, maintenance and repair work and 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 its operations such as software, mobile devices, desktop computers, peripherals, office stationery and office consumables.

Supply Chains

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



Postal and
Courier Services



Building
management
and maintenance



Stock and
printing suppliers



IT Suppliers
(equipment
and services)



Telecommunication
Services



Machine/Machine
maintenance



Security



Labour Hire and
Recruitment



Catering



Clothing/textiles
(includes uniform
suppliers)



Property
Services



Electricity



Financial
Services



Individual
Contractors



Office
Stationery



Gym/Health
and Fitness



Furniture
Rental



Consultancy
Services



Travel
Management

The majority of Fujifilm DMS' direct suppliers are small to medium businesses domiciled in Australia and registered as proprietary limited companies with registered offices in Australia and report purely local operations. However, following an analysis of Fujifilm DMS' Tier 1 suppliers, Fujifilm DMS has identified a number of goods and service procured by it which are sourced or originate from outside of Australia in the map below.



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

Fujifilm DMS Tier 1 suppliers





Area of Vulnerability: Raw Materials and Case Studies

During this reporting period, in addition to conducting its own supply chain due diligence, Fujifilm DMS has expanded its due diligence measures by identifying and addressing any Modern Slavery risks that may be present in its indirect supply chain, specifically suppliers who provide services or raw materials to Fujifilm DMS' direct suppliers. This has been done by way of in-depth case studies. For context, approximately 32% of suppliers who responded to Fujifilm DMS' Modern Slavery Questionnaire in this reporting period have reported using raw materials in the delivery of their services or provision of their goods, including: paper, ink and glue, metals (including steel, aluminum and copper), plastics, chemicals, wood and soils.



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



Paper



Ink and glue



Metals



Plastics



Chemicals



Wood and soils

Case Study: Batteries and associated raw materials

Fujifilm DMS has identified a number of indirect suppliers who supply its direct suppliers with mobile phones and laptops and assessed potential risks posed by the materials used by those indirect suppliers that are involved in the manufacture of these goods. Batteries were chosen due to the prevalence of Modern Slavery risks in goods that utilise raw minerals and metals, specifically where they are sourced from conflict prone countries or high risk geographical regions.

Fujifilm DMS then analysed the Modern Slavery statements of these indirect suppliers, conducted media searches and monitoring and obtained relevant sustainability reports. From this, it has been ascertained that cobalt is used in lithium-ion batteries which are commonly used in mobile phones and laptops. Cobalt may increase the risk of Modern Slavery as it is sometimes mined in conflict-affected and high-risk areas. However, this risk has been minimised as the indirect suppliers investigated by Fujifilm DMS have reported that they do not purchase minerals, including cobalt, directly from mines, smelters or refiners, that they conduct robust due diligence on their global supply chains and that they have responsible sourcing requirements throughout their supply chain. Other documentation and information of Fujifilm DMS suppliers that was looked at during this case study and were used to corroborate such statements include:

- responsible sourcing policies;
- associations with industry-wide groups such as the Responsible Minerals Initiative (RMI),
- following recommendations established by the Organisation for Economic Co-operation and Development Due Diligence Guidance (OECD) which include risk assessment, assurance and transparent reporting of such risks,
- emphasis on the identification and assurance of smelters and refiners used to process raw materials supplied by mines or mineral agents. The processes include an independent third-party assessment of management systems and practices to ensure compliance with the Responsible Minerals Assurance Process (“**RMAP**”). The RMAP standards are sector-wide and meet the requirements of the OECD Due Diligence Guidance;
- auditing of smelters and refiners to assess human rights risks in their minerals supply chains;
- ad hoc online training materials for suppliers that focus on their due diligence expectations and requirements for reporting;
- mandatory online and offline training for employees regarding responsible global procurement; and
- other due diligence measures such as requiring reporting by suppliers regarding conflict minerals, including cobalt.

Where Fujifilm DMS’ indirect suppliers’ supply chain is nonconformant or where they have reported on issues or risks of Modern Slavery, the indirect suppliers are required to work with such suppliers to remediate any Modern Slavery risks or remove such suppliers, where necessary.

Case Study: Paper and associated raw materials

Paper is another main material sourced by Fujifilm DMS for the provision of printing services to its clients. Fujifilm DMS has identified its larger suppliers of paper and conducted further due diligence to ascertain whether the use of paper increases Modern Slavery risks within its supply chain and whether this can be mitigated. It was identified that the main raw materials and resources procured for the production of paper by Fujifilm DMS' paper suppliers is pulpwood, pulp, electricity, water, chemicals and packaging materials.

Fujifilm DMS then selected and engaged with its suppliers who have committed to improving how they work with their own suppliers and their extended supply chain to identify and address any Modern Slavery risks within their operations and supply chain. It was ascertained that one of its main paper supplier has conducted a high-level risk assessment of its tier 1 supply chain along with a few supplier categories with inherent risks of Modern Slavery which were selected as an area of focus. The supplier however did not include sourcing or risks present in the manufacture of paper. The supplier has a Responsible Fibre Sourcing Policy in place which requires that their major fibre suppliers be ethically and sustainably certified. Fujifilm DMS anticipates that it will conduct further engagement with its paper suppliers in the next reporting period to understand Modern Slavery risks that may be present in the sourcing of their materials used in the manufacturing of paper.

Fujifilm DMS will continue to work with its raw materials suppliers and identify other Modern Slavery risks within its supply chain and conduct due diligence on indirect suppliers to further analyse the sectors, their extended supply chains and the sourcing processes and practices that may be present in its supply chains to identify and mitigate against Modern Slavery risks.

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

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

Potential Risks of Modern Slavery Practices in Supply Chain

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

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

Fujifilm DMS also undertook an analysis of its top suppliers based on spend and its top suppliers were in the areas of print suppliers (includes paper, machinery, equipment, envelopes, stationery and ink suppliers), labour hire recruitment, IT consulting and property leasing, with the vast majority of these being based in and operating out of Australia with the only exceptions being several suppliers based in Japan, Canada and Singapore.

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Similarly, Fujifilm DMS has continued to map out its supply chain’s geographical links as a means of determining associated Modern Slavery risks. None of Fujifilm DMS’ suppliers, or the suppliers to Fujifilm DMS’ suppliers, have reported that they originate from the top ten countries identified as having the highest prevalence of Modern Slavery (Global Slavery Index 2018 report), these being:

- | | |
|---------------------------------|----------------|
| 1. North Korea | 6. Mauritania |
| 2. Eritrea | 7. South Sudan |
| 3. Burundi | 8. Pakistan |
| 4. The Central African Republic | 9. Cambodia |
| 5. Afghanistan | 10. Iran |

During this reporting period, analysis was also carried to gain visibility on suppliers who have operations in other countries. Fujifilm DMS examined the prevalence of Modern Slavery ranking that has been attributed to each of the countries in the Global Slavery Index Report 2018 which is a ranking out of 167 countries, with the higher the ranking meaning the lower the prevalence of Modern Slavery. The following sets out the countries disclosed by suppliers who answered Fujifilm DMS’ Modern Slavery Questionnaire and their Modern Slavery ranking:

- | | |
|--|----------------------------|
| • Japan (167/167) | • Bangladesh (92/167) |
| • Canada (166/167) | • Indonesia (74/167) |
| • New Zealand (164/167) | • Vietnam (77/167) |
| • Australia (163/167) | • Russia (64/167) |
| • The United States of America (158/167) | • India (53/167) |
| • United Arab Emirates (148/167) | • Malaysia (42/167) |
| • Brazil (142/167) | • The Philippines (30/167) |
| • The United Kingdom (132/167) | • Thailand (23/167) |
| • China (111/167) | • Belarus (20/167) |
| • Singapore (97/167) | |

In many transactions, the supplier which Fujifilm DMS has contracted with is usually the Australian branch of a multinational group, who in turn has offices in one or more of the above countries. Generally, these multinational groups are headquartered in the US, Japan or another country with a high index ranking and Fujifilm DMS does not have any dealings outside of the Australian branch, thus reducing its geographic Modern Slavery risks.

Potential Risks of Modern Slavery Practices in Operations

Fujifilm DMS has engaged with its labour hire agencies and undertaken due diligence to ensure that they have robust systems and processes in place to ensure that their workers are not exploited and are adequately educated on their rights and entitlements. The agencies whom Fujifilm DMS engaged have a number of measures in place as well as an awareness of areas of risk such as workers who are migrants or visa holders.

One such measure taken was that additional and periodic checks would be carried out to ensure that proper working rights and visa status were maintained during a labour hire worker’s employment with a given agency and that with all workers generally, initial screening and verification was carried out by the agency as to their visa and work status. One respondent indicated that yearly audits were conducted to ensure compliance with labour laws and working requirements and that their staff were also trained to recognise and mitigate the risks of Modern Slavery and human trafficking.

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

- To take all reasonable steps and due diligence to ensure there is no Modern Slavery in its own 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 31 temporary workers throughout Australia. Fujifilm DMS intends to continue to closely monitor and work with its labour hire suppliers to ensure that the risks of Modern Slavery are mitigated and to undertake further study and due diligence around the temporary labour market.

Review to Identify Risks During Reporting Period

Fujifilm DMS undertook a further review to ascertain the risk of Modern Slavery within its own operations by examining its operations and liaising between business divisions to determine any change in risks from the previous reporting period. It was found that recruitment practices around the use of labour hire agencies continue to be a potential area for risk along with the presence of its operations in the Philippines. The review showed that there are a substantive number of measures in place to reduce the risks posed by labour hire use such as induction for temporary staff, contractual requirements around remuneration and payment of workers at award rates set out in its labour hire agreements and requiring labour hire agencies to comply with Fujifilm DMS' Supplier Code of Conduct which in turn requires that they meet legal requirements under applicable local labour laws.

Impacts and Risks Of COVID-19

Following on from the last reporting period, COVID-19 has impacted Fujifilm DMS' and its suppliers' operations and supply chain. The following is an assessment of ongoing impacts caused by COVID-19 in its operations and throughout its supply chain:

COVID-19 Risks on Operations

Fujifilm DMS' first priority has been for the health and safety of its employees, clients and customers and it adopts a proactive approach to such matters. For Fujifilm DMS' operations, impacts of COVID-19 meant that where possible, working from home measures were implemented for office employees and these continue to be in place to limit contact.

For Fujifilm DMS' operational sites in various state and territory locations, these sites remained open and operating during this reporting period with measures implemented at our premises in each state, in accordance with the relevant state's COVIDSafe Plan (where applicable) and in line with the relevant state and territory government directives and applicable WHS obligations. A copy of the National COVIDSafe Plan is available for viewing here: <https://www-fbdms.fujifilm.com/covidsafe-plan/>. All employees and contractors are requested to exercise precaution and abide by the risk control measures for each site and follow government directives and guidelines, to ensure they and their colleagues reduce the risk of COVID-19 transmission at each site. Fujifilm DMS' operational site management teams also conducted risk assessments to assess the adequacy and suitability of risk controls implemented at each site to ensure that they remain operational and COVID safe. The Senior Leadership Team ("SLT") remained flexible during this period, to ensure maximum support was provided to Fujifilm DMS' employees, operations and customers, having regular communications with the relevant site management teams to ensure support, direction and guidance was provided as required, due to the changing circumstances and changes to health directives.

COVID-19 Risks on Supply Chain

Based on collated Modern Slavery Questionnaire responses, only about 12% of suppliers responded indicated that they faced any change in processes due to COVID-19, with only about 1% reporting changes to their actual supply chain which is similar to the previous reporting period. Suppliers were queried on whether they had been affected by the COVID-19 pandemic and the magnitude of these effects on their operations and supply chain from a Modern Slavery perspective. Fujifilm DMS' suppliers reported that there was generally no supply chain impact and that for their own operations measures were undertaken in line with government health directions and precautions put in place to ensure a safe working environment. Some suppliers were ordering additional stock to account for delays in shipping, however as a general observation most suppliers were at a stage where they had adapted and were minimally impacted by the ongoing pandemic.

COVID-19 Risks in Labour Hire

The availability of labour hire workers through labour hire agencies were impacted as a result of limitations on international travel and arrivals and supply issues in the job market. This trend has continued and has affected Fujifilm DMS as this coincides with a number of Fujifilm DMS projects requiring the use of labour hire workers.



Actions taken to Assess and Address Modern Slavery Risks

Action: Updating Modern Slavery Questionnaire and developing a Secondary Questionnaire

For this reporting period, Fujifilm DMS updated its existing Modern Slavery Questionnaire to include a number of questions for suppliers to provide more information about their internal processes and existing questions were modified to address areas where responses were weak or incomplete. For example, questions were inserted regarding the areas that suppliers thought presented the greatest potential Modern Slavery risk in their supply chain, details regarding Fujifilm DMS' suppliers' onboarding processes (whether they had one and how/whether they assessed Modern Slavery risks).

In addition, Fujifilm DMS also developed a Secondary Modern Slavery Questionnaire in order to engage with its suppliers whom it had previously assessed as falling into a higher risk category due to a combination of geographic, sector, entity and/or industry risks and where their responses to our previous Modern Slavery Questionnaire were incomplete or lacked evidence of mitigation strategies and measures. Fujifilm DMS' aim with issuing the Secondary Modern Slavery Questionnaire was to identify any risks of Modern Slavery or lack of mitigation strategies and procedures in its higher risk suppliers' actions and gain a better understanding of their processes and circumstances.

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

Action: Expanding Fujifilm DMS' Engagement with its Suppliers

In the last reporting period, Fujifilm DMS engaged with its suppliers through its Modern Slavery Questionnaire which were assessed as higher risk or which contributed to a significant part of its supply chain based on spend value. During this reporting period, the scope of suppliers whom Fujifilm DMS has used in the last 12 months for assessment expanded to include new suppliers in the last 12 months who had not been previously assessed, suppliers who were operating in an industry with a recognised higher Modern Slavery risk, major suppliers based on spend and suppliers whom we had previously attempted to engage with in a previous reporting period and had been unresponsive or partially responsive.

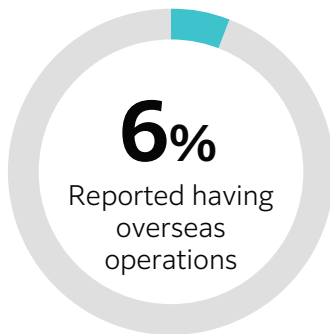
Fujifilm DMS engaged with its suppliers by having suppliers complete an initial Modern Slavery Questionnaire, by having higher risk suppliers complete a Secondary Modern Slavery Questionnaire and having suppliers liaise with vendor managers. It was observed that the Questionnaires had been completed by a variety of different personnel from the supplier and that there was a wide variation in the departments and titles of those responsible amongst suppliers for overseeing Modern Slavery risks. For example, the responsible personnel from some suppliers included legal department, compliance and risk team, human resources, the managing director, senior managers, procurement staff, operations managers, CFO, committee or commercial managers. In many instances with smaller businesses, the owner and director of the business would be directly responsible for management of any Modern Slavery risk. During this reporting period, responses received from Fujifilm DMS' suppliers indicated no new additions to the list of countries where its suppliers have operations with the vast majority of the suppliers surveyed this reporting period not having any operations outside of Australia.



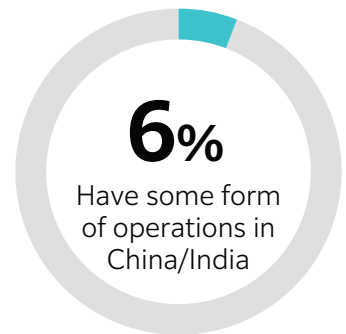
Approximately 96 Fujifilm DMS suppliers responded in the current reporting period to the questionnaire, with 6% reporting having overseas operations in countries with a higher prevalence of Modern Slavery risk with all 6% indicating some form of operation in either or both China and India, down from 11% in the last reporting period.



responded in the current reporting period to the questionnaire



in countries with a higher prevalence of Modern Slavery risk



↓ down from 11% in the last reporting period

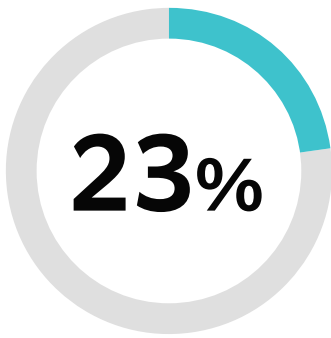
In this reporting period, 23% of suppliers surveyed used one or more suppliers located in a jurisdiction with a higher prevalence of Modern Slavery down from 26% in FY2021.



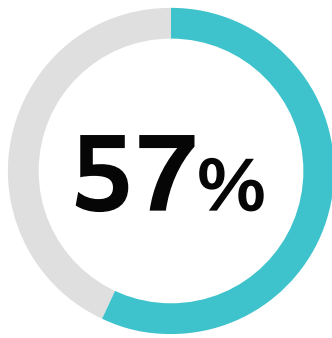
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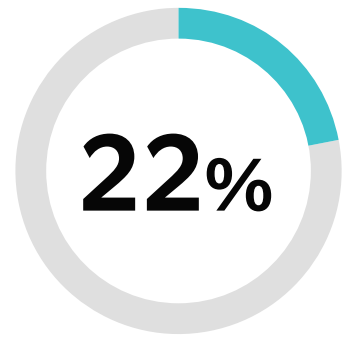
23% of the suppliers that responded within this reporting period were entities that were required to report or voluntarily reported under the Modern Slavery Act. However, the majority of suppliers were smaller suppliers, with suppliers with less than 100 employees making up 57% of the suppliers engaged with during this reporting period and 22% of suppliers using some form of labour hire.



23% of respondents that responded were entities that were required to report or voluntarily reported under the Modern Slavery Act.



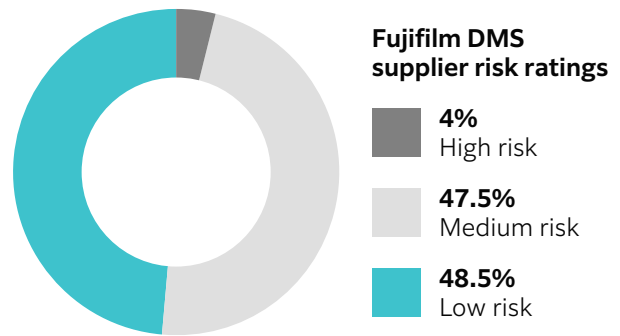
57% of suppliers that responded were smaller suppliers (suppliers with less than 100 employees)



22% of suppliers use some form of labour hire

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

Continuing from the previous reporting period, Fujifilm DMS has maintained its risk assessment process for identification and assignment of risk ratings to its suppliers. Where suppliers identified that they have mitigation processes and practices in place, their risk rating would be reduced accordingly. In this reporting period, approximately 4% of Fujifilm DMS' supply chain consists of higher risk suppliers, 47.5% medium risk suppliers and 48.5% low risk suppliers.





On the Secondary Modern Slavery Questionnaires, Fujifilm DMS achieved a response rate of 64% by the end of this reporting period. In a number of instances, smaller and overseas suppliers indicated that they did not have dedicated processes in relation to Modern Slavery. The majority had processes in place for their own employees and had a documented hiring and recruitment policy. In relation to supplier onboarding and risks of Modern Slavery among their suppliers, the majority had an onboarding process but lacked any Modern Slavery element in that process or otherwise were of the view that it was not necessary to put in place any process as it had never been part of their ordinary practices and that they were already compliant with their local laws. From this, it is apparent that Fujifilm DMS has the opportunity to further engage with some of these suppliers to provide better support and assistance and explore options to supply educational resources or an information pack to better help with their understanding of the various forms of Modern Slavery and how putting internal processes in place can identify and mitigate the risks of Modern Slavery. Fujifilm DMS intends to undertake further engagement and analysis of those suppliers who fall into the higher risk category, educate those suppliers and identify if there are mitigation measures that can be put in place to further assist them

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

Suppliers who directly supply to DMSP have an increased geographic risk of Modern Slavery practices. Fujifilm DMS and DMSP worked together to establish and understand the main suppliers of DMSP's operations and the environment and operations of those suppliers. It is noted that there are fewer suppliers used by DMSP in its operations and there has been a limited number of new suppliers engaged in the Philippines during this reporting period as compared to the last reporting period.

Throughout this reporting period, the Legal department liaised with DMSP's vendor managers to ensure that suppliers were completing their Modern Slavery Questionnaires adequately. Regular email communication took place with senior DMSP management personnel to ensure that they were aware of and were implementing the requirements under Fujifilm DMS' Modern Slavery Policy and due diligence procedures.

The responses received from DMSP's suppliers during this reporting period showed that the majority of assessed suppliers provided office supplies or IT supplies with approximately 80% being in the medium risk category, 10% in the higher risk category and 10% being in the lower risk category. Following an analysis of the responses from DMSP's suppliers over the past and current reporting periods, it is apparent that there is a knowledge gap amongst suppliers around what is Modern Slavery, what constitutes Modern Slavery and how Modern Slavery can occur throughout a supply chain. This is likely due in part to the fact that there is no analogous Modern Slavery reporting regime that exists in the Philippines and there is a limited understanding around conditions and circumstances that can give rise to Modern Slavery. In particular, this may be the first time that many local and smaller enterprises have had to deal with or engage in providing information and details on Modern Slavery and will have limited exposure and experience on the matter. There was also confusion or difficulty in understanding and navigating Fujifilm DMS' Modern Slavery Questionnaire and there may be a need explore options to localise or amend the Modern Slavery Questionnaire for DMSP suppliers.

Fujifilm DMS has undertaken increased and active consultation with DMSP vendor managers to assess and address the Modern Slavery risk in its operations, including improving the response rate of DMSP suppliers. Fujifilm DMS will look into providing better support and resources to educate and help suppliers to understand the risks of Modern Slavery and for its vendor managers to better engage with DMSP's key suppliers, potentially through targeted training and issuing of information sheets to DMSP vendor managers and issuing information packs to key suppliers. Further process review will also occur to identify where Modern Slavery practices and procedure can be better implemented into DMSP's operations and where supplier engagement can occur at the outset of the supplier relationship.

Action: Screening and Management Processes for Non-Responsive Suppliers

Fujifilm DMS also introduced a new process to capture new Fujifilm DMS suppliers who were onboarded during this reporting period, that did not fall within the scope of above criteria. This ensures that all new suppliers were captured in this reporting period at the onset of the supplier relationship, with the aim to broaden Fujifilm DMS’s visibility of its supply chain and to get an initial assessment on incoming suppliers. This initiative was highly successful and achieved a response rate of above 80% and forms a permanent part of Fujifilm DMS’ supplier setup process.

In addition, Modern Slavery considerations are now included as part of Fujifilm DMS’ vendor management framework and guidelines. The vendor management framework sets out the overall systems and arrangement necessary to ensure best practice for procurement. As part of the framework, procurement decisions now take into account the risk of Modern Slavery associated with a supplier or within that supplier’s extended supply chain and this forms part of Fujifilm DMS’ overall strategy to embed effective and permanent processes that deal with Modern Slavery in all parts of its business.

Following the successful introduction of a ‘Frequently Asked Questions’ section to Fujifilm DMS’ Modern Slavery Questionnaire in the last reporting period to provide a brief overview of Modern Slavery to questionnaire recipients and to educate on the fundamental concepts around Modern Slavery, this aspect of the questionnaire has been retained and is to be updated going forward and has also been utilised in all Modern Slavery Questionnaires, including those issued as part of supplier onboarding process and has assisted in engaging particularly with smaller businesses. Further, the Supplier Code of Conduct provided to all suppliers notifies suppliers that Fujifilm DMS may request that they conduct a self-assessment or provide further information when requested and that they are expected to provide an open and honest response and take corrective action if required.



Unfortunately, not all suppliers targeted to complete the Modern Slavery Questionnaire responded in this reporting period. This could be due to the impacts of COVID-19 on businesses, staffing issues in the current labour market and resourcing issues. Fujifilm DMS is working with its vendor managers to ensure a higher response rate through continued and active engagement with its suppliers.

Where Fujifilm DMS received incomplete responses from its suppliers, or the provision of documents instead of specific responses to questions, at first instance an attempt would be made to assess what was provided and to utilize that information in the assessment of the supplier. This included analysing published supplier Modern Slavery statements (where publicly available or disclosed), or other documents provided to Fujifilm DMS such as policies or reports. Where the responses were deemed inadequate, efforts were made to re-engage with those suppliers to request for completion of the Modern Slavery Questionnaire. Additionally, in certain instances, follow ups were performed to seek clarification on information provided to fully understand the responses provided. In limited instances where suppliers have refused to engage and respond regarding their Modern Slavery practices and procedures, Fujifilm DMS has chosen to discontinue its relationship with those suppliers and move forward with different suppliers.

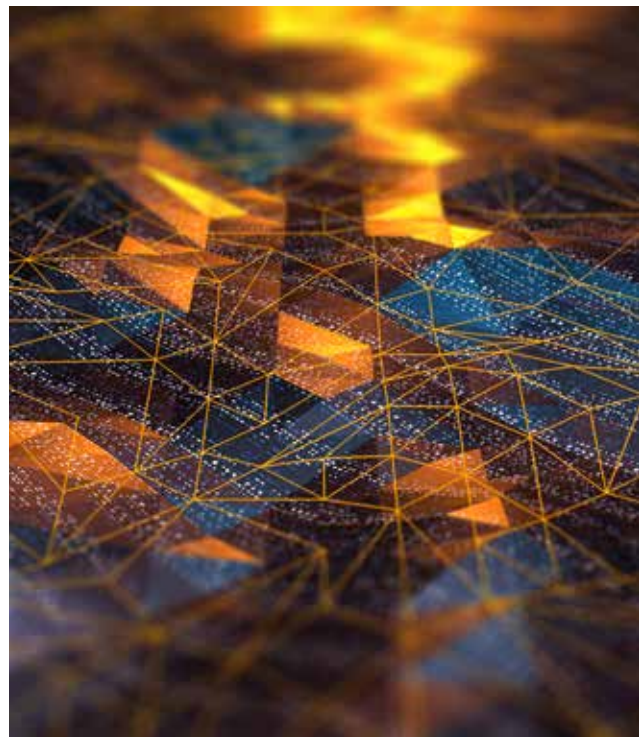
Action: Reducing Operational Modern Slavery Risks in Fujifilm DMS' Operations

The Fujifilm DMS Modern Slavery Task Force ("**Task Force**") was formed in 2019 and continues to drive the Fujifilm DMS' Modern Slavery project and related initiatives with the full support of Fujifilm DMS' Managing Director and the SLT. The Task Force members include the SLT (including the Managing Director), members of the Legal Department, Finance Department and vendor managers from each business group within Fujifilm DMS. The members of the Task Force are relied upon to meet Fujifilm DMS' Modern Slavery reporting obligations and to not only monitor and engage with Fujifilm DMS' suppliers but also to ensure compliance with its Modern Slavery compliance program and monitor Modern Slavery risks in its operations. In order to reduce the risk of Modern Slavery practices being present in its operations, Fujifilm DMS maintains stringent processes in on-boarding and managing engagement of employees and staff, to ensure their right to work in the relevant country as well conducting reference checks, criminal history checks and probity checks.

Action: Increasing Modern Slavery Awareness throughout the Organisation

Fujifilm DMS has an extensive onboarding process that includes interactive training on employee rights and entitlements, leave entitlements, the right to terminate/resign from employment, the Fujifilm DMS Anti-Bribery and Corruption policy and Fujifilm DMS Whistleblower policy. The onboarding process now 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 if employees become aware of or suspect Modern Slavery is occurring; and
- Making disclosures under the Fujifilm DMS Whistleblower Policy.



Additionally, vendor manager training was conducted by the Fujifilm DMS Legal Department to ensure vendor managers were equipped to build relationships with suppliers and engage with them. The training was well attended and was run on three separate occasions and included attendance by senior leadership, DMSP and Fujifilm DMS vendor managers and a number of other departments. The training included example scenarios of Modern Slavery occurring in an Australian company's supply chain, common goods that posed a Modern Slavery risk and provided information on what Fujifilm DMS' obligations were and detailed the responsibilities of each vendor manager. The responsibilities included:

- Provision of the Supplier Code of Conduct and Modern Slavery Questionnaire to suppliers;
- Obtaining responses from suppliers;
- Checking responses for completeness and accuracy;
- Engaging in active dialogue to ensure suppliers shared the same commitments to address Modern Slavery risks; and
- Information on avenues for vendor managers to report any instances of Modern Slavery under both the Fujifilm DMS Modern Slavery Policy and under the Fujifilm DMS Whistleblower Policy.

Fujifilm DMS' Legal Department members that were engaged in the Modern Slavery Project and were part of the Task Force have also continued to attend legal education seminars in relation to Modern Slavery identification, analysis and mitigation throughout this reporting period.

Action: Commencing Supplier Due Diligence & Media Monitoring

Fujifilm DMS, in this reporting period commenced an active monitoring initiative which involves the monitoring of changes and trends affecting Modern Slavery in Australia and globally so that Fujifilm DMS is able to adapt and respond quickly to mitigate any potential risk of Modern Slavery. This monitoring also extends to the monitoring of media reports and public sources in relation to some of Fujifilm DMS' new and high risk suppliers, their activities, their industry and their operating location. Examples of some of the sources that have been reviewed include news publications, investigative journalism articles, court judgments, NGO reports and government reports. Through this process, Fujifilm DMS is better able to verify the risks associated with certain suppliers and industries and also gain greater visibility of current events that influence the risk of Modern Slavery in its supply chain and suppliers and thereby work towards a more transparent and mapped-out supply chain.

Action: Annual Supplier Audits

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



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

Steps Taken to Assess Effectiveness and Future Actions

Fujifilm DMS continues to review and assess processes and procedures to ensure the effectiveness of its actions and to update and remediate as required to improve on existing processes and procedures.

To assess and evaluate its actions, Fujifilm DMS continues to liaise with vendor managers, suppliers and the SLT to understand how to better improve the effectiveness of its processes. Fujifilm DMS will also continue to hold regular progress meetings to review the status of and progress made in relation to the ongoing Modern Slavery Project, by looking at an overall operation of Fujifilm DMS and supplier engagement and management processes. During the review process, if there are identification of areas requiring improvement, existing processes are either modified, replaced and/or new process added to the existing process to try and address the issues. This is an ongoing process, to maximise the effectiveness of the Modern Slavery Project and to continuously make improvements in the areas where it is needed.

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

Responses from the suppliers in relation to the issues of Modern Slavery, including the Modern Slavery Questionnaire responses are monitored, tracked and analysed. During this reporting period, overall, there have been improvements in new supplier responsiveness and a reduction in the number of suppliers considered to be of a higher risk and a strong response rate to its secondary Modern Slavery Questionnaires directed at those suppliers from the previous reporting period who would be considered higher risk suppliers. There are also a lower number of suppliers with operations in higher risk geographic locations and generally a higher level of awareness and implementation of policy and mitigation methods to deal with Modern Slavery amongst medium to large suppliers.

Vendor managers are part of an ongoing effort to boost supplier engagement. The work of vendor managers and the implementation of a process to capture all new incoming suppliers and have visibility over their commitments to safeguarding against Modern Slavery has been useful in getting an immediate view of Fujifilm DMS' supply chain at onset of a relationship with a supplier. It also indicates to suppliers that Fujifilm DMS takes its commitments to combat Modern Slavery seriously and that these responses to the questionnaire are recorded and tracked and their responses are assessed thereafter.

Fujifilm DMS has also responded to a number of Modern Slavery questionnaires from its own customers. In doing so, Fujifilm DMS has been able to use these as opportunities to understand the expectations of its customers in relation to Modern Slavery, to 'test' its own Modern Slavery measures against a third party's evaluation criteria and to have a transparent view of the measures it has taken to mitigate the risk of Modern Slavery to date. Fujifilm DMS has responded to the questionnaires in a timely manner and strives to provide robust answers.

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

- Creation of a Modern Slavery fact sheet to facilitate vendor manager training;
- Creation of information packs to suppliers to assist with their Modern Slavery understanding;
- Expanding media monitoring efforts and including additional keyword searches;
- Consider including media monitoring assessments as part of the Modern Slavery risk assessment to consolidate, capture and address key Modern Slavery risks;
- Continue to refine its risk assessment methodology in categorising its suppliers into low, medium and higher risk sectors;
- 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;
- Focus on specific case studies for goods or services that are high risk and perform detailed analysis on the industries, practices and supply chains associated with these goods and services; and
- Focus on analysing procurement and essential/high value suppliers in the Philippines.



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 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 in their finance, human resourcing and TaPs departments 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.