

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION FROM THE MANAGING DIRECTOR OF FUJIFILM ELECTRONIC IMAGING EUROPE GMBH

FUJIFILM Electronic Imaging Europe GmbH is a distributor of digital cameras and accessories throughout Europe.

We are a part of the group of companies owned by FUJIFILM Corporation (“**FUJIFILM Group**”). Our ultimate parent company is FUJIFILM Holdings Corporation. Both FUJIFILM Holdings Corporation and FUJIFILM Corporation have their head offices in Japan.

The FUJIFILM Group are dedicated to developing mutually beneficial partnership relationships with suppliers. Through our procurement policies and procedures the FUJIFILM Group foster social and environmental responsibility, while encouraging fair trade and free enterprise in international markets.

The FUJIFILM Group are committed to improving our practices to combat any kind of slavery and human trafficking. Companies within the FUJIFILM Group are required to conduct their activities in accordance with the [FUJIFILM Group Charter for Corporate Behaviour](#) and the [FUJIFILM Group Code of Conduct](#) which cover a variety of ethical business principles including the prevention of slavery and human trafficking in the activities of such companies.

FUJIFILM Holdings Corporation published the [FUJIFILM Group Human Rights Statement](#) in June 2018. This applies to all personnel in the FUJIFILM Group and all business partners associated with the provision of any products and services of any FUJIFILM Group company are also expected to comply with this Statement. Recognizing the slavery and human trafficking impact of the conflict minerals issue, the [FUJIFILM Group's stance toward the issue of responsible minerals procurement](#) is also made clear in more detail on the FUJIFILM website and FUJIFILM Group companies are obliged to undertake the required actions in this area.

As part of the FUJIFILM Group’s commitment to these principles, in June 2015 FUJIFILM Corporation adopted the FUJIFILM Corporate Social Responsibility Procurement Guidelines for suppliers (“**Supplier Guidelines**”) under which suppliers are requested to commit to ethical business principles in a number of areas where human rights can be affected. These include the prohibition of forced labour, child labour and inhumane treatment (including in the context of conflict minerals). The Supplier Guidelines have also been adopted by FUJIFILM Group companies in other parts of Asia and North America and will continue to be introduced at other FUJIFILM Group companies.

In addition through its adoption of its Sustainable Value Plan 2030 (SVP 2030) in August 2017, FUJIFILM Holdings Corporation’s stated goal is to become a corporation that promotes social innovation involving all employees and action on social issues from a long-term perspective. In connection with the 15 priority issues established in the six areas of the environment, health, daily life, work style, supply chain and governance, enhancing management of the entire supply chain from the viewpoint of Corporate Social Responsibility has been established as one of the particular priority areas.

## **ORGANISATION STRUCTURE**

FUJIFILM Electronic Imaging Europe GmbH is incorporated in Germany. Here, FUJIFILM Electronic Imaging Europe GmbH acts as European distributor of digital cameras and accessories sourced from FUJIFILM Corporation. In addition, FUJIFILM Electronic Imaging Europe GmbH operates an individual country branch in the Netherlands.

Beginning in 1934 as Japan's pioneering photographic film maker, the FUJIFILM Group has leveraged its imaging and information technology to become a global presence known for innovation in healthcare, graphic arts, optical devices, highly functional materials and other high-tech areas. The FUJIFILM Group has nearly 32,000 employees worldwide and operates in most countries around the world. The FUJIFILM Group has a global annual turnover of around £11 billion.

## **OUR BUSINESS**

FUJIFILM Electronic Imaging Europe GmbH supplies FUJIFILM branded digital cameras and accessories directly to retailers and wholesalers in Germany, Netherlands, Austria, France, the UK and Ireland. The Company also manages stock on a central basis from Düren and distributes to other FUJIFILM subsidiaries across Europe. Lastly, the Company sells to a number of third-party distributors in smaller countries, who represent FUJIFILM and sell to their local retailers. Our individual country branch in the Netherlands supports the Dutch market.

## **OUR SUPPLY CHAINS**

We source almost all of our products from FUJIFILM Corporation in Japan. A small quantity of accessories is purchased locally, along with marketing materials and other assets which support the running of the business in Germany and Netherlands. These, along with the services we procure, are almost exclusively sourced from local suppliers based in the European markets in which we operate.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We comply with the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#), and [FUJIFILM Group Human Rights Statement](#) which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and promoting this approach in our supply chains to prevent and mitigate any human rights abuses.

As almost all of the products we sell are ultimately sourced from FUJIFILM Corporation, this is also reflected in their adoption of the Supplier Guidelines as referred to above.

## **OUR PROCESSES TO PREVENT SLAVERY AND HUMAN TRAFFICKING**

All FUJIFILM Group staff around the world are required to abide by the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#), and [FUJIFILM Group Human Rights Statement](#) in order to ensure that all FUJIFILM Group companies exhibit and promote ethical business activities.

FUJIFILM Holdings Corporation conducts annual screening of priority risk issues (including potential ones) in business processes at all FUJIFILM Group companies. All FUJIFILM Group companies identify priority risk issues, plan and execute necessary measures to address those issues, and manage their results. Priority issues for the FUJIFILM Group as a whole, based on the review results for each

FUJIFILM Group Company, and the results of action implemented are reported to, and deliberated on by, the FUJIFILM Holdings ESG Committee and reported to the Board of Directors of FUJIFILM Holdings Corporation. This includes human rights issues. Human rights are specified explicitly as one of the perspectives requiring attention at each FUJIFILM Group Company in review of our priority risk issues. If a FUJIFILM Group Company has identified any human rights risk, it is required to develop and implement preventive and mitigating measures.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from FUJIFILM Group companies in certain other part of Asia and North America (if any), procurement staff in those companies are expected to identify and assess potential risk areas in the supply chain and work with suppliers in those areas in order to seek to establish that those suppliers act in accordance with the Supplier Guidelines.

As part of the initiatives in FUJIFILM Europe generally to identify and manage risk, for the products that we source from elsewhere and for services, our procurement staff work to mitigate the risk of slavery and human trafficking occurring in our supply chains in accordance with the [FUJIFILM Group Charter for Corporate Behaviour](#) and [FUJIFILM Group Code of Conduct](#).

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

The FUJIFILM Group promotes actions to ban slavery and human trafficking from its supply chain mainly with the framework of ethical procurement.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from FUJIFILM Group companies in certain other parts of Asia and in North America (if any), suppliers of those products are requested to commit to the ethical business principles set out in the Supplier Guidelines. The Supplier Guidelines cover items listed in the [FUJIFILM Group Charter for Corporate Behaviour](#), [FUJIFILM Group Code of Conduct](#), and [FUJIFILM Group Human Rights Statement](#) that FUJIFILM Group companies request their suppliers to follow, as well as all the items covered in the Code of Conduct of the Responsible Business Alliance (RBA).

FUJIFILM Corporation also use the FUJIFILM Group Supplier CSR Checklist to assess suppliers' compliance with the Supplier Guidelines where considered necessary. As a result of suppliers completing these Checklists since FY2015, primary suppliers in Japan, Europe and the US have been assessed as a low CSR risk. In the year ending 31 March 2019, FUJIFILM Corporation have extended the request to complete these Checklists to other suppliers in Japan and Europe. In addition FUJIFILM Corporation conducted audits of suppliers to its Chinese manufacturing subsidiary and requested correction of risk factors.

For the products that we source ourselves and for services, our activities consist of working with our suppliers to understand their approach to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

#### **TRAINING**

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we work with our procurement staff to ensure they act ethically and with integrity in their interactions with our suppliers and to implement and promote this approach in our supply chains.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of trained staff (staff are required to understand the Company's policy on all CSR activities, including Modern Slavery)
- New employee training for the Modern Slavery Act (as above)
- The Company ensures compliance with national minimum wage act and working time regulations
- The company undertakes a continuous review of the supply chain to ensure our sourcing is done within the Group's strict guidelines

## FURTHER STEPS

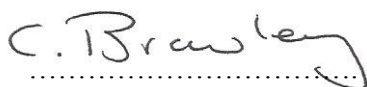
With effect from 1 April 2019, FUJIFILM Holdings Corporation revised the [FUJIFILM Group Charter for Corporate Behaviour](#) and [FUJIFILM Group Code of Conduct](#). They have been translated into 24 languages and global education by e-learning is being carried out including disseminating the [FUJIFILM Group Charter for Corporate Behaviour](#) and [FUJIFILM Group Code of Conduct](#) and the [FUJIFILM Group Human Rights Statement](#) to all FUJIFILM Group employees.

To combat the human rights risk within the supply chain, FUJIFILM Group companies will continue to promote the actions with the framework of ethical procurement. In the current year, they will monitor the improvement status of those suppliers where human rights related risks were found and correction measures specified.

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Finalising the implementation of the Supplier Guidelines into our own procurement activities once introduced into Europe by the FUJIFILM Group
- Follow up with a number of our suppliers in the perceived higher risk sectors to establish further confidence in their compliance activities in this area

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for FUJIFILM Electronic Imaging Europe GmbH for the financial year ending 31 March 2019.



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Christopher Brawley  
Managing Director  
FUJIFILM Electronic Imaging Europe GmbH

Date: 18th September 2019

This statement was approved by the Managing Directors of FUJIFILM Electronic Imaging Europe GmbH on 18th September 2019.