

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE MANAGING DIRECTOR OF FUJIFILM HEALTHCARE UK LIMITED

FUJIFILM Healthcare UK Limited is a distributor of, and service provider in relation to, products in the UK and Ireland for the healthcare sector.

We are a part of the group of companies owned by FUJIFILM Holdings Corporation which has its head office in Japan (“**Fujifilm Group**”).

As a global organisation providing customers with innovative product and service solutions around the world, the Fujifilm Group is involved in the procurement of numerous materials, components and services. In this role the Fujifilm Group acknowledges that it is responsible for ensuring the quality and safety of its product and service solutions and appropriately managing the supply chain of materials, components and services used in their production. The Fujifilm Group is also a significant user of services within its organisation at both a global and local level. In response to ever increasing social demands, the Fujifilm Group is keen to fulfil its social responsibilities across its entire supply chain. The scope of this responsibility covers the global environment, ethics, human rights, health and safety and other labour conditions of those working within the supply chain from a corporate social responsibility perspective. FUJIFILM Holdings Corporation has signed up to United Nations Global Compact, a voluntary initiative that encourages companies to undertake fair operations in the area of human rights, labour, environment and anti-corruption.

Under a partnership with its suppliers based on mutual understanding and trust, the Fujifilm Group aims to build a more robust and sustainable supply chain through socially responsible procurement that reduces business risks in the supply chain and increases the competitiveness and corporate value of all parties in the chain. As part of these activities, the Fujifilm Group continues to improve its 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. For those of our companies involved in the healthcare sector, the [Fujifilm Group Global Healthcare Code of Conduct](#) must also be complied with.

The [Fujifilm Group Human Rights Statement](#) applies to all personnel in the Fujifilm Group. All business partners associated with the provision of any products and/or services of any Fujifilm Group company are also expected to comply with this Statement. This is driven by a belief that respecting the human rights of workers in the supply chain increases productivity and moral action, which in turn leads to the provision of better products and services, as well encouraging innovation. In addition the [Fujifilm Group AI Policy](#) establishes basic principles for the application of AI technology, such as respect for human rights and fair and appropriate use of the technology, for our various businesses to guide the drive to accelerate the use of technology to resolve social issues.

The Fujifilm Group aims to develop together with its suppliers by encouraging them to take initiatives in CSR activities to spread such positive effects. 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 global 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, FUJIFILM Holdings Corporation continues to develop its Sustainable Procurement Promotion Program that covers (1) dissemination of procurement-related policies (including the Fujifilm Group Sustainable Procurement Guidelines for Suppliers (“**Supplier Guidelines**”) which 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); (2) risk assessments of suppliers in high risk areas; and (3) requests to improve any supplier facing CSR risks together with offers of support. The program is run cyclically to check on suppliers to ensure improvements have been made. This Sustainable Procurement Promotion Program has been adopted by Fujifilm Group companies in Japan (including FUJIFILM Corporation (a Japanese subsidiary of FUJIFILM Holdings Corporation which owns the group of subsidiary companies to which we belong)) and certain Fujifilm Group companies in other parts of Asia, in Europe and in North America. This Sustainable Procurement Promotion Program will continue to be introduced at other Fujifilm Group companies around the world.

In addition, FUJIFILM Holdings Corporation's stated goal under its Sustainable Value Plan 2030 (SVP 2030), 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

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 over 72,000 employees worldwide and operates in most countries around the world. The Fujifilm Group has a global annual turnover of over £15.6 billion.

OUR BUSINESS

Our business in FUJIFILM Healthcare UK Limited is now organised into five business units: Medical Informatics, Modality Equipment, Endoscopy, Ultrasound and In Vitro Diagnostics which supply **FUJIFILM** branded products and services (and certain other products) to the UK and Irish healthcare market as distributor for the wider Fujifilm Group. The number of business units and the scope of some of these business units was expanded following the acquisition of the Medical Systems business of FUJIFILM UK Limited with effect from midnight on 30 September 2023.

OUR SUPPLY CHAINS

Our product supply chain is dominated by products supplied by other Fujifilm Group companies (mainly sourced from FUJIFILM Corporation). We source all these products and all our other products for onward sale to customers from our European intermediate parent company, FUJIFILM Europe B.V. based in the Netherlands. The only products we purchase ourselves are either for local marketing purposes or for internal consumption in running our business in the UK and Ireland. These, along with the services we procure, are mostly sourced from UK and/or Irish suppliers.

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 most 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. For those products and services that we purchase ourselves we provide our new suppliers and business partners with a statement of our expectations of them in ensuring that there is no modern slavery or human trafficking in our supply chains and make it clear that their adherence to those expectations are necessary for continued custom from FUJIFILM Healthcare UK Limited.

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 Corporation 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. FUJIFILM Holdings Corporation uses external risk screening services for vetting suppliers for potential unethical business activities to enable early initial responses. As of August 2024 this service covers nearly 3,300 suppliers in China, Japan and other Asian countries, from which we source about 70% of our direct materials in terms of procurement amount. There are plans to register additional suppliers in other geographical areas within the current year.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from certain Fujifilm Group companies in other parts of Asia, Europe and North America (if any), procurement staff in those companies are expected to operate the Sustainable Procurement Promotion Program in order to seek to establish that 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 sell that are ultimately sourced from FUJIFILM Europe B.V., for products that we source ourselves and for services, our procurement staff and those of FUJIFILM Europe B.V. work to mitigate the risk of slavery and human trafficking occurring in our or their supply chains in accordance with the [Fujifilm Group Charter for Corporate Behaviour](#) and the [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 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) as set out in the Supplier Guidelines.

More and more Fujifilm Group companies 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, primary suppliers in Japan, Europe and the USA have been assessed as a low CSR risk. These Fujifilm Group companies continue to extend the request to complete these Checklists to other suppliers in Japan, Europe and the USA. In the reporting year Fujifilm Group companies received 30% more completed Checklists than in the previous year. Fujifilm Group companies also have provided feedback sheets to each supplier after receipt of a completed Checklist which includes scores and comments on where improvements (if any) are necessary, including on human rights-related items. In cases where significant risk is identified, Fujifilm Group companies continue to conduct on-site CSR audits using expert teams from Fujifilm Group company production sites. Again, China and Vietnam were the main countries where issues arose with further risk assessment being required on 65 suppliers which resulted in carrying out on-site audits of 50 suppliers out of 65. In addition to the on-site audits, interviews and other follow-up engagements were conducted with 44 suppliers where responses to the Checklist were deemed worthy of more detailed investigation. As a result of all these activities, improvements have been confirmed with suppliers in areas such as better management of overtime hours/prevention of continuous work shifts, improved labour/human rights management systems in relation to, amongst other things, discrimination and the health and safety of young workers, better management of chemicals and toxic substances and ensuring that suppliers have in place internal whistleblowing systems.

An online seminar on sustainable procurement explaining Fujifilm's requirements in this area was held for suppliers to Fujifilm in Japan in January 2024 which 106 suppliers attended. In March 2024, a hybrid (in-person and online) seminar was held on the same subject for suppliers to one of Fujifilm's major production sites in China. A total of 168 suppliers, including direct material suppliers and contractors, participated. A similar seminar planned to take place in China this year will be expanded to include suppliers to other Fujifilm companies in China.

For the products that we sell that are sourced from FUJIFILM Europe B.V., for products that we source ourselves and for services, our activities and those of FUJIFILM Europe B.V. consist of working with our or their 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. Compliance with the Modern Slavery Act 2015 is part of our contracting processes with our supplier and business partners (one aspect of which is the inclusion of a specific provision in our standard terms and conditions of purchase).

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 staff who are involved in procurement activities are made aware of our responsibilities around modern slavery and human trafficking and are directed to the UK government guidance for further information.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have appointed an internal team to conduct a review of our current practices and to bring insights on ways to we can tackle slavery and human trafficking. This review will facilitate the development of KPIs to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

FURTHER STEPS

To combat human rights risks within the supply chain, Fujifilm Group companies will continue to promote actions with the framework of ethical procurement. In June 2024, the Fujifilm Group joined the [Japan Center for Engagement and Remedy on Business and Human Rights \(JaCER\)](#) which provides a non-judicial “Engagement and Remedy Platform” in relation to potential human rights issues that complies with the United Nations’ Guiding Principles on Business and Human Rights. By utilizing this external platform, Fujifilm aims to enhance the objectivity and fairness of its grievance (whistleblowing) mechanisms in its supply chain in the area of human rights, leading to more appropriate responses. Procurement department staff in group companies responsible for procuring production materials within Japan have attended in-house seminars on these updated grievance (whistleblowing) mechanisms and their importance in achieving Fujifilm’s ethical procurement goals.

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:

- Develop greater understanding of modern slavery and its impacts within our teams through defining divisional responsibility and delivering training
- Roll-out enhanced survey to improve insight of actions taken by suppliers which will be submitted to all suppliers before 31 December 2024
- Review processes and feedback from survey roll-out, with a view to implementing enhanced questionnaire for all existing suppliers, after 1 April 2025
- Adopt the new Fujifilm Europe Supplier Code of Conduct in the current year and a requirement for suppliers to comply with this Code of Conduct will be added to our new or renewed contracts with those suppliers and also included in our standard terms and conditions of purchase

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 Healthcare UK Limited for the financial year ending 31 March 2024.

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Allan Elborn
Managing Director
FUJIFILM Healthcare UK Limited

Date:

This statement was approved by the Board of Directors of FUJIFILM Healthcare UK Limited on 23 September 2024.