

# Supplier Code of Conduct

## Committed to Corporate Social Responsibility and Ethical Procurement

This Supplier Code of Conduct applies to all suppliers of Fujifilm Data Management Solutions (Fujifilm DMS) and its subsidiaries, as well as all suppliers of Fujifilm MicroChannel and its subsidiaries. Fujifilm DMS and Fujifilm MicroChannel are committed to corporate social responsibility and ethical procurement practices. We promote respect for the environment, human rights and ethical business practices. This document outlines the business practices and professional standards that Fujifilm DMS and Fujifilm MicroChannel expect from its suppliers.



### Corporate Ethics

Fujifilm DMS and Fujifilm MicroChannel request that suppliers recognise the importance of Corporate Ethics, and promote and manage the following elements:

#### Corporate Ethics, Compliance & Risk Management

- Provide a basic policy and principles on corporate ethics and risk management
- Ensure compliance with all applicable laws and regulations including sanctions, modern slavery and anti-bribery and corruption laws
- Ensure compliance with the Australian Privacy Act 1988 and any applicable international privacy and data protection frameworks relevant to regions in which Fujifilm DMS or Fujifilm MicroChannel operate

#### Anti-Corruption

- Prohibit the offering of bribes to government officials and ensure that this is observed in day-to-day activities
- Forbid the acceptance of excessive entertainment & benefits with regard to company activities

#### Protection of Intellectual Property

- Prohibit the infringement of other companies' intellectual property and ensure that this is observed in day-to-day activities

Ensure proper handling of software licences and third-party technology assets

#### Guarantee of Fair Procurement Transaction

Introduce measures to implement fair procurement transactions and ensure that they are carried out

#### Establishment of Process for Raising Concerns and Whistleblowing

Introduce and administer with impartiality an effective system for Whistleblowers to present problems

#### Robust Information Security System

Ensure proper implementation of organisational frameworks and systems to manage:

- Privileged, proprietary or confidential business information
- Personal and sensitive information

Suppliers must comply with Privacy and Information Security laws, Regulatory requirements and Information Security Standards when collecting, using, storing, processing, transmitting or sharing personal, sensitive, proprietary or confidential information on behalf of either Fujifilm DMS or Fujifilm MicroChannel

Implement and maintain controls to detect, contain and report cybersecurity incidents promptly and within any timeframes required by applicable law or regulations, including the Notifiable Data Breaches scheme under the Australian Privacy Act

## Artificial Intelligence (AI) – Responsible Use

Fujifilm DMS and Fujifilm Microchannel expect suppliers to use artificial intelligence tools in a secure, legal and ethical manner. Specifically, suppliers must:

Not use AI tools to process, analyse, or generate outputs using confidential or personal data belonging to Fujifilm MicroChannel, Fujifilm DMS, or their clients, without prior written approval

Comply with applicable laws and regulations relating to AI use, including emerging obligations under Australian and international frameworks

## Recommendation of Application to Your Company's Suppliers

Recommend and apply measures to your suppliers to ensure the maintenance of corporate ethics and compliance with applicable laws, similar to those measures implemented by Fujifilm DMS and Fujifilm MicroChannel and our affiliates

## Declare and Manage Conflicts of Interests

- Introduce and administer a process for declaring and managing conflicts of interest in connection with their engagement by Fujifilm DMS or Fujifilm MicroChannel
- Where actual, potential or perceived conflicts of interest are identified, they must be declared, managed and recorded appropriately and immediately reported to Fujifilm DMS or Fujifilm MicroChannel

## Business Continuity

Given Fujifilm MicroChannel's and Fujifilm DMS's role in delivering business-critical technology solutions to clients:

- Maintain and regularly test a Business Continuity Plan and Disaster Recovery Plan relevant to the services provided to Fujifilm MicroChannel or Fujifilm DMS
- Notify Fujifilm MicroChannel or Fujifilm DMS promptly of any incidents that could materially affect the continuity or security of services being delivered

## Environment

Fujifilm DMS and Fujifilm MicroChannel request that suppliers recognise the importance of Environment & Sustainability by promoting and managing the following activities & business operations:

### Prevention of Global Warming

- Promote energy saving product designs
- Promote energy conservation at facilities
- Endeavour to reduce the emissions of the greenhouse gases

### Promoting the Reduced use of Natural Resources

- Reduce the use of raw materials used at Supplier sites
- Ensure efficient use of material to prevent wastage

### Recycling and Proper Waste Disposal

- Endeavour to reuse and recycle
- Ensure proper disposal of products after use to reduce wastage and to ensure proper disposal of waste
- Apply responsible IT asset disposal practices for any hardware supplied to or managed on behalf of Fujifilm MicroChannel, Fujifilm DMS, or their clients

### Proper Management of Chemical Substances

- Ensure that hazardous substances are not used to produce products
- Endeavour to assess the safety of chemical substances used
- Establish a system to prevent air and water pollution
- Prevent soil contamination and leakage into soil

### Preservation of Biological Diversity and Ecosystem

- Recognise the importance of preserving the environment
- Plan and manage activities relative to the preservation of the environment

### Adherence to Administrative Procedures

Obtaining or submitting all approvals and licenses, notifications and reports specified under the applicable laws and regulations in a timely manner

### Promote Third Party Certification of an Environmental Management System (EMS)

- Establish a management system compliant with ISO14001 or other EMS
- Endeavour to obtain third-party certification of its EMS

### Recommendation and Application to Suppliers' Suppliers

- Recognise the importance of environmental measures taken throughout the supply chain
- Recommend and apply environmental measures similar to those implemented by your company to your supplier

## Human Rights and Labour

Fujifilm DMS and Fujifilm MicroChannel request that all suppliers recognise the serious impact of not respecting Human Rights and fair Labour practices by promoting and managing the following activities

### Legal right to work

Ensure staff meet the local legislated requirements to have a legal right to work in the relevant country in which they are working

### Prevention of Modern Slavery and Child Labour

Oppose all forms of modern slavery, including forced or compulsory labour, trafficking in persons, debt bondage and child labour, both within its activities and undertakings, and within its supply chain.

### Prevention of Unfair Discrimination

Prohibit unfair treatment in recruitment, promotions, treatment and educational opportunities

### Prevention of Violence, Sexual Abuse, Sexual Harassment and Excessive Punishment in the Workplace

- Ensure physical punishment, violence and intimidation are prevented
- Provide policy prohibiting sexual abuse and harassment
- Eliminate unjust restriction of access to food and beverages, rest, bathroom facilities and medical attention as punishment or harassment

### Appropriate Wages and Proper Management of Working Hours and Mandatory Days off

- Abide by the applicable legal requirements such as the minimum wage, working hours, mandatory days off and leave of absence
- Maintain accurate payroll records

### Prevention of Work-Related Accidents at Workplaces and on Duty

Eliminate dangerous factors from operations, the working environment, mechanical equipment, substances used, etc.

### Sufficient Health and Welfare Measures

- Provide a safe and healthy environment and maintain and promote employee health

### Promotion of Human Resource Development

- Assist in developing and realising employee career plans
- Assist employees in overall development

## Assessments / Audits

Suppliers shall self-monitor to ensure their compliance with this code, maintaining detailed records that demonstrate their compliance. Any non-compliance with this code should be notified to the relevant Fujifilm DMS contact person.

Both Fujifilm DMS and Fujifilm MicroChannel reserve the right to carry out regular audits of our suppliers to ensure alignment with this code.

#### An audit may be in the form of a:

- Self-assessment by suppliers,
- Request for information, or
- Site visit

#### We expect that suppliers of both Fujifilm DMS and Fujifilm MicroChannel will:

- Respond in full and be open and honest in response to any requests for information, making available any relevant records for review.
- Complete an agreed corrective action plan until a satisfactory level of improvement is reached if there are any breaches or shortcomings regarding the code identified

[fujifilm.com/fbdms](https://fujifilm.com/fbdms)

**FUJIFILM**

**FUJIFILM Business Innovation Corp.**  
FUJIFILM Data Management Solutions Pty Ltd  
FUJIFILM MicroChannel Services Pty Ltd

Version 3.2 – July 2026