

Fujifilm Group

Charter for Corporate Behavior and Code of Conduct



Fujifilm Group's Commitment

An embodiment of our aspirations, propelling our Group toward realizing our Purpose.

Fujifilm Group's Purpose

Giving our world more smiles

We bring diverse ideas, unique capabilities,
and extraordinary people together to change the world.

Corporate Slogan

Value from Innovation

Fujifilm Group's Charter for Corporate Behavior/Code of Conduct

We approach all our activities with an "open, fair and clear" corporate culture.

Charter for Corporate Behavior

1. A Trusted Company
2. Social Responsibility
3. Respect for Human Rights
4. Global Environmental Conservation
5. Vibrant Workplaces
6. Management of Various Crises

Code of Conduct

We emphasize compliance and endeavor to create new value. If compliance requirements conflict with business profits or the demands of third parties, we give priority to compliance.

1. Respect for Human Rights
2. Fair Corporate Activities
3. Protection / Preservation of Corporate Assets and Information
4. Measures Related to Environmental Issues

Committing to the Fujifilm Group Charter for Corporate Behavior and Code of Conduct

The Fujifilm Group has always been able to drive innovation while transforming its business to suit the changing times. The rapid changes in society that have been occurring in recent years have required us to deal with several issues that are becoming increasingly complex and sophisticated, such as geopolitical risk, climate change and natural disasters, environmental issues, human rights, health, labor, and information management. Society's needs and rules are always changing, so it is important to ensure we pursue harmonious growth together with our stakeholders that strives to balance business and social considerations in a speedy way and is unfettered by convention or stereotypes.

No doubt, the Fujifilm Group will continue to face a number of difficult issues and problems in the future, and, when we do, our Charter for Corporate Behavior and Code of Conduct will serve as valuable guides. The Charter for Corporate Behavior summarizes Fujifilm Group basic policies for conducting corporate activities, while the Code of Conduct specifies how we should act in various situations. Every year in the month of April, all Fujifilm Group employees around the world declare their intention to read, digest, comply with, and act on these documents and start the new fiscal year with renewed zeal. Given that everything we do should be based on an open, fair, and clear corporate culture, I would ask you to constantly refer to the Charter for Corporate Behavior and the Code of Conduct to ensure you can be proud of any action you take as part of your daily business activities as a member of the Fujifilm Group.

I hereby declare that I will comply with the Fujifilm Group Charter for Corporate Behavior and the Code of Conduct. I ask you all to fully comprehend and comply with these principles in everything you do. Let's work together to overcome the many challenges and difficulties that we will undoubtedly face going forward and create positive outcomes that give the world more smiles.

January 2024



Teiichi Goto
President, Representative Director & CEO
Chairperson, ESG Committee
FUJIFILM Holdings Corporation

General Provisions:

1. Scope of Application

This Charter for Corporate Behavior and Code of Conduct shall apply to all executives and all employees of FUJIFILM Holdings Corporation and all of its group companies. Moreover, related parties, including contractors, dispatched employees, sales representatives, and business partners associated with the provision of products and services of the Fujifilm Group shall be requested to respect this Charter for Corporate Behavior and Code of Conduct in the performance of that work.

2. Procedures for Establishment and Revision

The establishment and revision of this Charter for Corporate Behavior and Code of Conduct shall be decided by the ESG Committee of FUJIFILM Holdings Corporation. The Charter for Corporate Behavior and Code of Conduct and any revisions shall apply to each group company at the time of notification from FUJIFILM Holdings Corporation.

3. Standardization of Rules

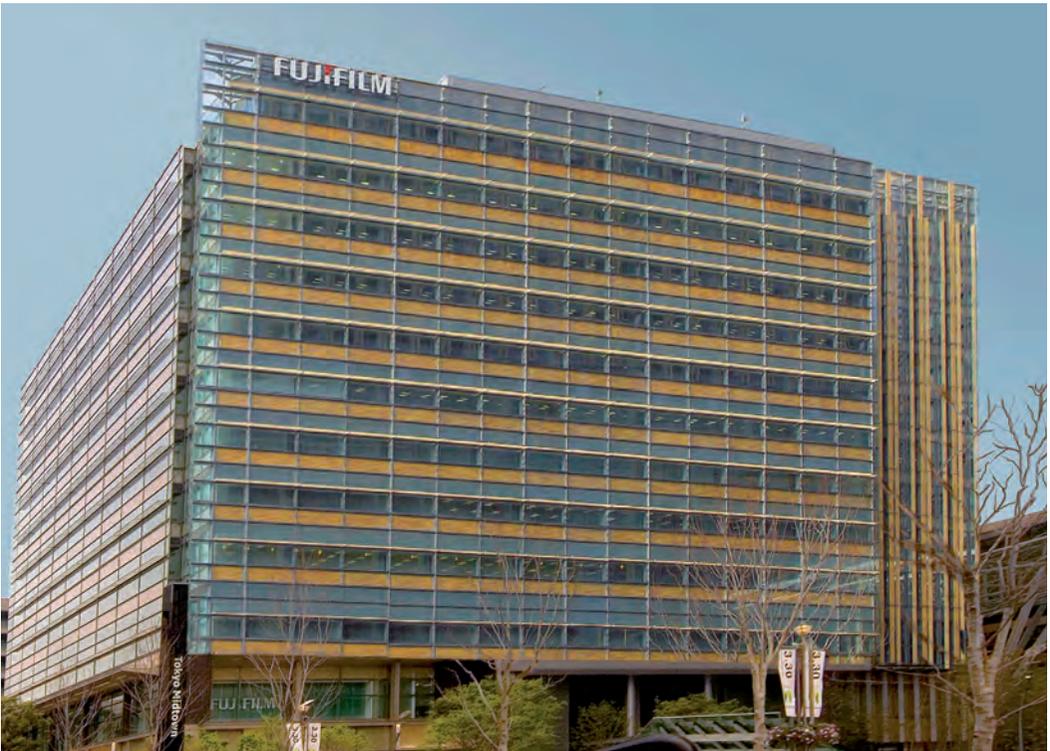
This Charter for Corporate Behavior and Code of Conduct shall provide the common rules to be followed by all executives and employees of FUJIFILM Holdings Corporation and its group companies. All executives and all employees shall be expected not only to follow these rules, but also to exercise high ethical judgment and behavior in response to the expectation of their society and locality.

4. Ensuring Compliance

Companies and employees shall be expected to work to comply with this Charter for Corporate Behavior and Code of Conduct. Executives and managerial staff, including executive officers in charge of particular sections, division general managers and managers of FUJIFILM Holdings Corporation and each group company shall be responsible for managing the implementation of this Charter for Corporate Behavior and Code of Conduct within the organizational body they oversee.

5. Sanctions and Penalties against Violation

In the event that an executive or employee violates this Code of Conduct, that person may be subject to disciplinary action or other consequences in accordance with the Fujifilm Group applicable company regulations. In the event that the violation causes damage to the company, the company may take legal measures, including seeking compensation for damages.



Fujifilm Group: Charter for Corporate Behavior:

In addition to pursuing profits through fair competition, corporations must make a contribution to society at large. To this end, in accordance with the following six principles, the Fujifilm Group, in its corporate activities in Japan and abroad, respects human rights, as well as observes both the spirit and the letter of all laws, regulations, and international rules. In addition, it takes into account the impact of its activities and, through innovation, proactively works toward creating a sustainable society.

1. A Trusted Company

We develop and provide socially beneficial products and services of the highest quality using advanced and original technologies in a safe and responsible manner. Based on an open, fair and clear corporate culture, we create new value in the spirit of appropriate competition and fair dealing. We continually strive to satisfy customers and other stakeholders and earn their trust to grow together.

2. Social Responsibility

We communicate with various stakeholders such as customers, business partners, employees, local communities, government agencies, shareholders and investors, NGOs and NPOs, and conduct appropriate and fair disclosure of corporate information. Furthermore, we comply with laws, regulations, and other rules, and uphold public order and ethics. As good corporate citizens, we strive to correctly understand and respect local cultures and customs, and willingly conduct community engagement activities. In addition, we aim to stimulate local communities through employment creation and promote a sustainable society.

3. Respect for Human Rights

We respect human rights set out in international declarations. We take into account vulnerable people and reject the use of forced labor or child labor in any form, and in addition to abiding by the local minimum wage laws of each country and region, we are aware of the importance of suitable wages that enable people to cover the costs of living healthy and cultural lives.

4. Global Environmental Conservation

Recognizing that positive involvement in environmental stewardship is an essential part of a corporation's social role and activities, we will act voluntarily and proactively to help solve various environmental challenges, such as by addressing climate change, conserving biodiversity, establishing a circular economy, and ensuring chemical safety.

5. Vibrant Workplaces

We strive to develop the skills of all employees, to provide safe and comfortable workplaces, and to respect their diversity, personality, and individuality.

6. Management of Various Crises

We will ensure systematic crisis management in response to risks that may threaten civic life and corporate activities, such as natural disasters, terrorism, cyberattacks, and organized crime.

Recognizing top management's responsibility to embody the spirit of this Charter, the Fujifilm Group executives shall lead by example and promote sound understanding of the Charter both within group companies and among business partners. They shall strive to continually take account of views within and outside the group, establish efficient corporate systems, and foster high ethical standards. In the event of situations that contravene this Charter, top management shall clearly indicate both within and outside the group its approach to resolving the situation and work to identify its causes and prevent any recurrence. Top management shall take accountability, promptly and appropriately disclose information, and take strict disciplinary action when appropriate, including in regard to itself.

Fujifilm Group: Code of Conduct:

Introduction

Currently, the world is facing countless challenges. To pass on a rich and vibrant society to future generations, we need to solve various societal challenges related to the environment, energy, food, health and medicine, safety and disaster prevention, and respect for human rights, while also ensuring economic growth. Companies are expected to contribute to solving these challenges and to creating a sustainable society through innovation in collaboration with various stakeholders.

To this end, it is important how we conduct our business activities. We need to ensure that we are engaged with stakeholders and enabling two-way dialog (being open), complying with rules in a just and impartial manner (being fair), being responsible for our own decision-making and actions, and ensuring transparency with honesty and integrity (being clear). Various laws and rules exist within society. In the business world, as in our everyday lives as members of society, our societal value is determined by our compliance with such laws and rules.

To ensure we continue to be a company that is needed and trusted by society, we will generate value for creating a sustainable society, with compliance as the basis of all our efforts.

Fujifilm Group Compliance Statement

The Fujifilm Group defines compliance as more than simply not breaking the law: we believe compliance includes acting correctly in the light of common sense and ethics. In all aspects of our corporate activities, we emphasize compliance and endeavor to create new value. If compliance requirements conflict with business profits or the demands of third parties, we give priority to compliance. An open, fair, and clear corporate culture is the basis for all our activities.



1. Respect for Human Rights

The most fundamental and essential aspect for each and every one of us is human rights. Individual dignity is at the core of our innate human rights, and if such rights are not respected, the employees who are crucial for company's growth cannot fully meet their potential, and we cannot continue as a company that is needed and valued by society. Observing the following points will form the base for us to maximize the potential of all the people who are directly and indirectly affected by our business activities, as well as to generate societal value.

(1) Respect of human rights

We respect and do not infringe on the human rights guaranteed by the Universal Declaration of Human Rights and other international declarations, conventions, guidelines and applicable laws and regulations, as well as judicial precedents.

(2) Respect and promotion of diversity

We will embrace diversity to generate new value and contribute to a richer society through respecting, accepting, and being inspired by each employee's personality and individuality, unconstrained by differences in back grounds or beliefs.

(3) Prohibition of discrimination

We respect one another as individuals, and do not discriminate on the grounds of nationality, age, gender, sexual orientation or gender identity, race, ethnicity, religion, political opinions, ideologies, national or social origin, disability, etc., nor do we base decisions regarding hiring, promotion or advancements, benefits, or educational opportunities on these factors.

(4) Prohibition of bullying and harassment

We do not speak or act in ways that degrade individual dignity or that disadvantage or threaten individuals based on issues such as gender, authority or position (sexual harassment or power harassment), nor do we engage in any other form of bullying or harassment.

(5) Protection of privacy

We do not share or disclose information relating to individuals' private lives gained in the workplace or in the course of our duties without the clear consent of the individual concerned. We will appropriately manage any personal data we receive in accordance with all applicable laws and regulations.

(6) Promotion of work-life balance

We aim to support employees' high performance in the workplace and their personal circumstances and responsibilities. In order to do this, we will work together to pursue the professional development of ourselves, our colleagues, and the people with whom we interact in the course of our duties, while we respect individual needs and are understanding of personal circumstances including family care responsibilities such as childcare and nursing care.

(7) Prohibition of forced labor/child labor

We do not take part in any form of forced labor or child labor, including slave labor, bonded labor or human trafficking. We enable the free choice of employment through proper employment processes, and take required measures to prevent forced labor and child labor.

(8) Promotion of occupational safety and health

We comply with applicable occupational health and safety laws and regulations, such as those designed to prevent workplace accidents. We will give due consideration to the physical and mental health of ourselves, our colleagues, and the people with whom we work, and aim to maintain and enhance safe, healthy and fit working environments.

(9) Respect of labor rights

We respect and do not infringe on labor rights in accordance with local laws and established practices, including workers' rights to organize and bargain collectively.



2. Fair Corporate Activities

We strive to ensure that the corporate activities we are involved in are open, fair, and clear. Contravention of the points listed below may lead not only to legal sanctions, but also to loss of trust of the company. We will comply with these points and aim for highly ethical practices. Our corporate activities will be promptly and accurately reported via managers and all steps of the designated procedures will be carried out.

(1) Active communication

We prioritize internal and external two-way communication to respond to the demands of society and to strive for mutual development alongside society, and maintain an open, fair, and clear attitude and stance in the implementation of our corporate activities.

(2) Information disclosure

We establish accountability by actively and appropriately disseminating our corporate information, including our management policy and activities, to various stakeholders such as customers, business partners, employees, local communities, government agencies, shareholders and other investors, and NGOs and NPOs.

(3) Fair competition

We recognize the importance of free market competition, and do not apply unreasonable trading restrictions or use unfair trading methods that could impede fair competition.

(4) Fair sales activities

We maintain equitable and fair sales practices with our customers and sales partners such as distributors. We do not engage in improper sales practices involving customers and sales partners, such as falsifying sales records, nor do we engage in actions that could cause a reasonable suspicion of collusion with customers and sales partners.

(5) Fair procurement

We maintain fairness in our relationships with suppliers. We do not engage in actions that could undermine fair relations with suppliers, such as enjoying personal advantages (in the form of money, goods, services, etc.) or otherwise abusing our dominant bargaining position.

(6) Prevention of corruption

We exercise prudence and scrupulous care in our relationships with foreign and local government officials and other public employees, and we do not take part in corrupt behavior.

(7) Prohibition of bribery and restriction on gift-exchange and entertainment

We do not engage in gift-exchange or entertainment or the provision of political contributions, donations, or sponsorships that could undermine fairness, or pay kickbacks for contracts, so that we can maintain sound relationships with our customers and business partners, including distributors and suppliers, and can keep honorable/honest relationships with all foreign and local government officials and other public employees.

(8) Prohibition of ideological/religious activities in our roles as executives and employees

We do not use our positions as company executives or employees to support or oppose any given political party, group or candidate, or other ideological or religious group.

(9) Rejection of organized crime

We reject any relationship with groups involved in illegal activities or that threaten public order and safety, and we do not act in ways that benefit such groups, including facilitating money laundering.

(10) Compliance with trade control regulations

We comply with all applicable trade control regulations related to the import and export of goods, technology, and software, as well as the external disclosure of technological information (including technology guidance), and work to maintain international peace and security.

(11) Accuracy of financial reporting and appropriate tax payments

We strive for accuracy in accounting and financial reporting in the course of our corporate activities, and we do not falsify accounts or take part in any activity related to such falsification. We comply with the tax laws of the countries and regions where we operate as well as international tax rules, and pay appropriate taxes in each as required by law.

(12) Quality assurance/safety of products and services

We make absolutely sure that our products and services are safe and of high quality in providing them to the market. We recognize the importance of universal design, which ensures that our products and services are accessible to all regardless of language, culture, nationality, age, gender, or disability. We also provide easily comprehensible and accurate labeling and descriptions of our products and their use, and strive to prevent accidents. In the event an accident does occur, we respond promptly and appropriately.

(13) Responsible marketing

We will conduct marketing and promotion activities that sincerely and accurately convey information related to our products and services to consumers and customers.



3. Protection/Preservation of Corporate Assets and Information

Companies have many assets. In conducting our business, we use a broad range of such assets, including not only our own corporate assets, but also customers' information and many kinds of tangible and intangible assets entrusted to us via contracts with our business partners and associates. As companies face increasingly diverse threats including natural disasters, organized crime, terrorism, and cyberattacks, we must protect both our own property and the property rights of these third parties from such threats. In the course of our day-to-day work, it is becoming increasingly important to take care in dealing with the information and assets we handle and to take preventative measures to protect them from harm, and refrain in appropriate information disclosure.

(1) Effective use of corporate assets

We actively and effectively use our corporate tangible and intangible assets, which are a key management resource, to deliver products and services that feature leading-edge, proprietary technologies.

(2) Prohibition of improper use of corporate assets

We appropriately manage and use tangible and intangible corporate assets such as products, facilities, equipment, information and intellectual property. We neither use them for personal gain or any other improper purpose, nor act in any way that might damage or devalue them.

(3) Prohibition of conflicts of interest

We do not act in ways that place our own personal gain or the gain of family, friends or acquaintances above the interests of the company. For example, we do not compete with the businesses of the company, involve ourselves in such competitive businesses or work in the interests of competitors.

(4) Prohibition of insider trading

We do not act in ways designed to bring personal benefit such as trading in shares, bonds or other securities on the basis of non-publicly-available knowledge obtained in the course of our duties or obtained specially from business partners and others using our position as executives or employees (insider trading).

(5) Protection of confidential information

We recognize that corporate confidential information is an important corporate asset, and manage it with rigorous care to maintain confidentiality.

(6) Protection of others' intellectual property

We do not improperly acquire or utilize non-public information belonging to others. Nor do we infringe on others' intellectual property rights, such as copyrights or patent rights.

(7) Protection of personal information

We recognize the sensitivity of personal information, and handle it appropriately and comply with the applicable laws and regulations regarding the gathering, recording, managing, using, disposing of such sensitive information.

(8) Crisis management

We conduct systematic crisis management in preparation for emergency response to threats such as natural disasters, terrorism, and cyberattacks. If such events should occur, we will work to minimize the impact on related stakeholders, prioritizing the safety of our employees and local citizens.



4. Measures Related to Environmental Issues

Environmental issues are major challenges shared by humanity that cannot be solved by one region or nation alone. It requires the collaboration of individuals, businesses, local communities, and various other stakeholders. In addition to compliance with relevant laws and regulations, we enhance our environmental management systems to reduce the environmental burden at all stages of our corporate activities, from raw material procurement to product development, manufacturing, logistics, sales and services provision, customer use, and product end-of-life. In addition, we aim to contribute to solving environmental challenges through leading-edge technology and innovation. In order to pass on this irreplaceable earth to future generations, individual awareness and voluntary action of every employee is required.

(1) Response to climate change

We recognize that the progression of human-caused climate change is a global challenge, and will work toward a carbon neutral society. We will proactively promote measures to reduce greenhouse gas emissions, and control the impact of climate change throughout all of our business activities.

(2) Contribution to a circular economy

We recognize that resources are finite, and will work toward establishing a circular economy by further promoting reduction, reuse, and recycling of resources.

(3) Safety and effective use of chemicals

We will take necessary measures in the development, production, use, and disposal of chemicals to avoid the adverse effects to human health and the environment. In addition, we will maximize the effectiveness of chemicals to help solve various societal problems.

(4) Protection of local environments and partnerships with local communities

We, as a member of the local communities, will partner with various stakeholders to protect air, soil, and water, to reduce noise pollution, vibrations, and odors, and to conserve biodiversity.

Using the whistleblowing system

Officers and employees can consult or report concern to the whistleblowing system when questions regarding the Code of Conduct arise or when a violation of the Code has been identified. The aim of the whistleblowing system is to create a better company environment while preventing small issues in your workplace from growing into serious matters. The basic principle is that issues which occur in your workplace should be solved within the workplace. However, you can report and seek support for an issue with the compliance division in your company or by contacting the whistleblowing system when you find it difficult to report your concerns to a superior.

- Employees will not be retaliated against or receive any retribution for making good faith reports to the whistleblowing system.
- Making a false, defamatory or malicious report is prohibited.

For more information on the whistleblowing system, please refer to the company website or compliance posters provided by your company and the regional headquarters.

