Fujifilm Group

Global Healthcare Code of Conduct

FUJIFILM
Value from Innovation

Healthcare has become one of the world's most important industries as people pay increasing attention to health and wellness. Fujifilm Group, as a comprehensive healthcare company, offers a wide range of products and services in the fields of prevention, diagnosis and treatment.
In all of our healthcare activities, we strive to promote the health and safety of patients and support our customers in accordance with applicable laws and regulations, anchored by our open, fair and clear corporate culture, along the following fundamental principles:

Healthcare Business Mission Statement

1. We treat the health and safety of patients as the first priority in all of our activities.
2. We respect patients and their rights of self-determination, dignity, privacy and human rights.
3. We conduct research and development activities with the highest level of quality, safety and integrity.
4. We provide appropriate and clear information regarding our products and services, and keep accurate books and records.
5. We ensure appropriateness and transparency in our interactions with healthcare professionals.

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General Provisions

1. Subject of Application

This Fujifilm Group Global Healthcare Code of Conduct (“**Code of Conduct**”) falls under the Fujifilm Group Charter for Corporate Behavior and Fujifilm Group Code of Conduct, and applies to all executives and all employees of FUJIFILM Holdings Corporation and all of its group companies (each a “**Company**” or "**Fujifilm Group**"), who are involved in research, development, application for approval, manufacturing, sales, provision or support of medical devices, pharmaceuticals, in vitro diagnostics, regenerative medicine products, life science products or healthcare-related services (collectively, the “**Healthcare Business**”). Moreover, we take appropriate steps to request related parties, including contractors, dispatched employees, sales representatives, and business partners associated with the provision, sales or support of healthcare products or services of each Company engaged in the Healthcare Business to respect the standards and requirements in this Code of Conduct.

2. Procedures for Establishment and Revision

The establishment and revision of this Code of Conduct shall be decided by the ESG Committee of FUJIFILM Holdings Corporation. This Code of Conduct and any revisions shall apply to each Company at the time of notification from FUJIFILM Holdings Corporation.

3. Sanctions and Penalties against Violation

In the event that an executive or employee who is involved in the Healthcare Business violates this Code of Conduct, that person may be subject to disciplinary action or other consequences in accordance with the 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.

4. Reporting of Violations and Inappropriate Practices

In cases when a resolution cannot be reached even after consulting a superior, or when consulting a superior is difficult, employees and executives can consult directly with the Company’s compliance department, the helpline of each Company or the regional helpline, without going through a superior. For more information regarding the helpline, please refer to the websites and posters provided by FUJIFILM Holdings Corporation, regional headquarters and the Company.

1. Relationships with Patients

We treat the health and safety of patients and participants in our research activities as the first priority in each process of the Healthcare Business, and we are fully committed to respecting patients' and research participants' rights of self-determination, dignity, and privacy, as well as their human rights.

(1) Research and Development

We conduct the research and development of our healthcare products and services with the highest level of quality, safety, and integrity, and comply with applicable laws, ethical policies, international standards including GLP (Good Laboratory Practices) and GCP (Good Clinical Practices) and any related Company internal regulations. When conducting animal experiments that are necessary for research and development, we handle animals with due consideration to animal ethics.

(2) Proper Data Handling

We properly handle data obtained from the research and development of our healthcare products and services and do not tolerate any falsification or manipulation of data. In addition, we take appropriate steps to supervise contractors and other business partners who may handle our data to ensure that the Fujifilm Group's standards and requirements are followed.

(3) Disclosure of Test Results

When disclosing the results of tests and research activities, we ensure that the information is accurate, up-to-date, unbiased and not misleading, regardless of the outcome.

(4) Obtaining Informed Consent

We communicate with research participants in a fair and transparent manner and obtain their appropriate informed consent as required by applicable laws and ethical standards, when conducting tests and research for the development and improvement of our healthcare products and services.

(5) Privacy Protection

We take necessary measures to protect and secure the privacy and confidentiality of personal data. We take extra care when handling any types of sensitive personal data that require special protection.

(6) Quality, Safety and Indications for Use of Products and Services

Product quality and safety is our top priority. We take all possible measures to ensure the quality and safety of our healthcare products and services and provide such products and services consistently. In addition, we make every effort to prevent adverse events by accurately and comprehensibly displaying and describing information about the use of healthcare products and services. When it is necessary, we take corrective measures and promptly report events to the relevant internal divisions, affiliates and regulatory authorities.

(7) Handling of Complaints

We promptly report to the relevant internal divisions and affiliates, appropriately investigate and take any corrective measures as necessary when receiving complaints regarding healthcare products and services. We appropriately report such complaints to the relevant regulatory authorities as required.

(8) Safety Information

We continue to evaluate our healthcare products and services by conducting post-sale safety management and surveillance. Furthermore, we promptly and appropriately report safety information regarding our healthcare products and services to the appropriate internal divisions, affiliates and relevant regulatory authorities as required, and take any necessary actions.

(9) Collaboration with Patient Organizations

When engaging with patient organizations, we shall maintain a strong sense of ethics and respect the independence of the patient organizations. Our engagements with patient organizations will be clearly documented, our interactions will be transparent and compliant with applicable laws, to ensure public trust and foster broad understanding that Company support contributes to the activities and development of patient organizations.

2. Relationships with Healthcare Professionals

In the Healthcare Business, we are required to maintain appropriate and transparent relationships with healthcare professionals and medical institutions. We provide them with appropriate information and respond ethically and in good faith avoiding any acts that have an inappropriate impact.

(1) Accurate Disclosure of Information

We provide healthcare professionals with appropriate and accurate information on our healthcare products and services.

(2) Compliance with Indications for Use and Advertising Regulations

We provide a complete and adequate picture of our indications for use and the benefits and risks associated with our healthcare products in our advertising and promotional labeling, including appropriate usage of our products and services as approved by the required approving agencies. We comply with all regulations applicable to marketing and advertising of our healthcare products and services and strive to ensure clear and truthful information is provided in our marketing and advertising materials.

(3) Compliance with Anti-corruption Regulations

When we interact with both domestic and foreign healthcare professionals, we comply with the anti-corruption regulations and competition laws in each country and region, including those that prohibit inappropriate solicitation, including the offer of or the provision of economic benefit, for the purpose of influencing decisions regarding the purchase or use of healthcare products and services, as well as the Company's internal policies and guidelines.

(4) Ensuring Transparency

We pay attention to any conflicts of interest when providing support and benefits to healthcare professionals. We comply with the disclosure and transparency regulations in countries and regions seeking to record and report such information, as well as those disclosure regulations that are deemed as industry standards, and make appropriate publications in accordance with applicable laws and internal regulations.

(5) Outsourcing, Joint Research and Development

We conduct appropriate selection when outsourcing necessary duties, such as consultations, to healthcare professionals and when conducting joint research and development with healthcare professionals. In addition, we put the contents of the activities in writing, determine in advance the fees due for services in light of the contents of the duties required and services to be provided by healthcare professionals as well as the fair market value of the healthcare professionals' time. We do not unfairly solicit or require any purchase of the Fujifilm Group's products or services in return for engaging with a healthcare professional, nor do we engage with healthcare professionals as a reward for prior purchases or as an inducement for future purchases of our products.

(6) Product Evaluations and Tests, Feedbacks and Technical Support

We engage with appropriate healthcare professionals and enter into written agreements with those healthcare professionals prior to conducting product evaluations, tests and feedback for healthcare products and services. We comply with applicable laws and regulations when providing technical support for healthcare products and services in the clinical front and as part of training for healthcare professionals.

(7) Gifts and Hospitality

We comply with anti-corruption and anti-bribery laws and our internal regulations related to the provision of gifts and hospitality to healthcare professionals. In particular, we ensure that gifts and hospitality are limited in nature so that healthcare professionals are not inappropriately influenced when making decisions regarding opportunities to collaborate with or support the Company, or purchase healthcare products and services from the Company.

(8) Donations, Grants and Sponsoring

We donate and provide grants to medical institutions and external organizations only in accordance with applicable laws and regulations and in an appropriate and fair way. Such decisions are taken independently of any past or future sales activities. In addition, we ensure that the purpose and content of any funding is recorded in writing.

3. Relationships with Business Partners

In all business activities, we strive to ensure that relationships with our business partners are in line with our open, fair and clear corporate culture, and we do not conduct any act that may raise any doubt regarding unfair relationships.

(1) Fair Trading

We comply with applicable laws, industry standards and related internal regulations when interacting with business partners, for example, when providing discounts or rebates for healthcare products and services.

(2) Marketing Activities

In all our marketing and promotion activities, we adhere to applicable laws, industry standards and internal regulations.

(3) Suppliers, Distributors and Other Third Parties

When we engage with third parties, including suppliers and distributors, we endeavor to act with the highest ethical and business standards and hold them to the same standards to which we hold ourselves, including quality requirements. We expect our suppliers, distributors and other business partners to conduct business in a manner that is in compliance with applicable laws and internal regulations and expect our suppliers and distributors to maintain these standards down their supply chain. We consider compliance with our standards to be essential when choosing new business partners or continuing our relationships with existing ones.

(4) Trade Controls

We adhere to applicable trade control regulations and sanctions and apply internal processes designed to prevent the use of our healthcare products in improper ways. We refuse any business that bears the risk of misuse of our healthcare products, such as for nuclear, biological or chemical weapons or other improper activity. We expect our business partners to strictly comply with these same commitments.

4. Relationships with Public Officials, Governmental Agencies, Regulatory Authorities and Politicians

We strive to create appropriate and transparent relationships with public officials, governmental agencies and regulatory authorities. We ensure that any funds provided to politicians, political parties, political organizations or other parties are made in accordance with applicable laws and internal regulations.

(1) Relationships with Public Officials

We deal with public officials appropriately and do not act against the laws and regulations that are applicable to public officials as well as the regulations of the organization to whom such public officials belong.

(2) Approvals

We obtain necessary approvals from the regulatory authorities and other approval agencies before we manufacture and sell healthcare products and provide services. We comply with applicable laws and internal regulations, and maintain the accuracy and appropriateness of the materials and data used when applying for approval. We do not tolerate any falsification or manipulation of materials and data, and fully supervise contractors commissioned by the Company.

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