

**Fujifilm Group  
Sustainable Procurement Guidelines  
for Suppliers**

**Ver.2.0**

**March 2022  
FUJIFILM Holdings Corporation**

**Table of Contents**

I. Introduction ..... 2

II. Fujifilm Group Procurement Policy ..... 3

III. Request Items and Self-Assessment Checklist .....6

IV. Reference Materials .....26

## **I. Introduction**

There are growing social expectations in recent years for companies to address a variety of social issues such as climate change and human rights. Many of the issues cannot be resolved by one company alone. When it comes to supply chain, it is essential to collaborate with suppliers to make a unified action.

Aiming for a sustainable world, the Fujifilm Group wishes to work together with our important business partners to resolve environmental and social issues in our global supply chain.

This document outlines CSR-related practices the Fujifilm Group would like our partners to adopt in line with our CSR approach and policy. These Guidelines, originally compiled in 2015 in accordance with the revision of our procurement policy, have been updated to incorporate changes in social demand and expectations. We hope you find these guidelines useful in promoting your CSR initiatives.

We appreciate your continued cooperation and understanding for sustainable procurement activities of the Fujifilm Group.

March 2022  
FUJIFILM Holdings Corporation

## **II. Fujifilm Group Procurement Policy**

Based on the Fujifilm Group's Approach to CSR and Human Rights Statement, we uphold the Procurement Policy as a group-wide policy. We believe it is important that our business partners, especially production materials suppliers, understand the importance of CSR (environment, human rights, occupational health and safety, corporate ethics, etc.) and work together with us in resolving issues.

### 1) **Fujifilm Group Procurement Policy**

In all procurement activities, the Fujifilm Group will conduct “Open, Fair, Clear” transactions in compliance with relevant laws and regulations globally, paying full considerations to our environmental and social impacts. We will consider suppliers as partners for creating better products, and strive to build mutual trust for co-existence and mutual prosperity.

#### **1. Open**

- We will treat all suppliers, irrespective of nationality, with fairness and ensure that they are given equal business opportunities. We are also committed to considering procurement from new suppliers.
- We create opportunities for new suppliers who wish to trade with us by periodically reviewing our regular suppliers.
- We solicit offers only when considering making a purchase order. If asked, we explain, within reasonable and possible limits, our reasons for not accepting an offer or competitive bid.

#### **2. Fair**

- We do not engage in procurement transactions with a direct purpose of having the suppliers purchase our products or services.
- We strictly manage and strive to preserve the confidentiality of supplier information obtained through procurement transactions.
- We respect the intellectual property rights of a third party and our suppliers, and do not engage in procurement transactions that lead to the violation of their intellectual property rights.
- As a rule, we compare offers from multiple suppliers simultaneously to nurture sound competition and select suppliers fairly.

#### **3. Clear**

- We are committed to engaging in fair procurement activities in compliance with laws and regulations globally, paying full considerations to perspectives including the environment, human rights, occupational health and safety and corporate ethics across our supply chain.

- We procure from excellent and trustworthy suppliers selected through comprehensive criteria that include quality, price, delivery time, technological capabilities, services, CSR activities and business continuity across their supply chain.
- As a rule, we specify terms in written contracts. We sign a master agreement for ongoing transactions and conduct transactions based on it.
- Our procurement personnel do not permit personal interests to influence relationships with existing or prospective suppliers.

**【Relevant Policies】**

- The Fujifilm Group's Approach to CSR  
URL: <https://holdings.fujifilm.com/en/sustainability/vision/policy#link01>
- Fujifilm Group Human Rights Statement  
URL: <https://holdings.fujifilm.com/en/sustainability/vision/policy/statement>
- Fujifilm Group Procurement Policy, Request to Suppliers and Fujifilm Group's Stance Toward the Issues of Responsible Minerals Procurement  
URL: <https://holdings.fujifilm.com/en/sustainability/vision/policy/procurement>

## 2) Request to Suppliers

The Fujifilm Group recognizes the importance of social responsibility and corporate ethics in undertaking business activities not only within the Group itself but also in partnership with our suppliers as we strive to build stronger partnerships.

The Fujifilm Group Procurement Policy refers to our commitment to procure from "trustworthy suppliers selected through comprehensive criteria that includes quality, price, delivery time, technological capabilities, CSR activities and business continuity."

These are suppliers that operate in line with the Fujifilm Group Charter for Corporate Behavior and Code of Conduct.

Our Charter for Corporate Behavior and Code of Conduct are available at the following sites.

- Fujifilm Group Charter for Corporate Behavior:  
URL: <https://holdings.fujifilm.com/en/about/philosophy/conduct>
- Fujifilm Group Code of Conduct:  
URL: <https://holdings.fujifilm.com/en/about/philosophy/law>
- ※ Both are available in 24 languages.  
URL: <https://holdings.fujifilm.com/en/about/philosophy#24languages>

We request our business partners to share the policies and requirements with your employees, subcontractors, and other stakeholders involved in the Fujifilm Group's business, and to understand and comply with them.

### **III. Request Items and Self-Assessment Checklist**

In order to identify the status of our business partners' CSR initiatives based on our "Request to Suppliers," the Fujifilm Group may ask your company to carry out a (written) self-assessment before or after commencing business dealings with us, or visit your site to check your CSR status in person. The table below lists items that we place particular emphasis on in our Code of Conduct. Please refer to each item when checking your own initiatives.

#### **Supplemental Information on Each Item of the Fujifilm Group Code of Conduct**

Category	Section	Item	Page
<b>[1] Respect for Human Rights</b>	1	Respect of human rights	8
	2	Respect and promotion of diversity	8
	3	Prohibition of discrimination	9
	4	Prohibition of bullying and harassment	9
	5	Protection of privacy	10
	6	Promotion of work-life balance	10
	7	Prohibition of forced labor / child labor	11
	8	Promotion of occupational safety and health	12
	9	Respect of labor rights	13
<b>[2] Fair Corporate Activities</b>	1	Active communication	14
	2	Information disclosure	14
	3	Fair competition	15
	4	Fair sales activities	15
	5	Fair procurement	15
	6	Prevention of corruption	16
	7	Prohibition of bribery and restriction on gift-exchange and entertainment	16
	8	Prohibition of ideological / religious activities in our roles as executives and employees	17
	9	Rejection of organized crime	17
	10	Compliance with trade control regulations	17
	11	Accuracy of financial reporting and appropriate tax payments	18
	12	Quality assurance/safety of products and services	18
	13	Responsible marketing	19
<b>[3] Protection/ Preservation of Corporate Assets and Information</b>	1	Effective use of corporate assets	19
	2	Prohibition of improper use of corporate assets	19
	3	Prohibition of conflicts of interest	20
	4	Prohibition of insider trading	20
	5	Protection of confidential information	20
	6	Protection of others' intellectual property	21
	7	Protection of personal information	21
	8	Crisis management	21

<b>[4] Measures Related to Environmental Issues</b>	1	Response to climate change	22
	2	Contribution to a circular economy	22
	3	Safety and effective use of chemicals	23
	4	Protection of local environments and partnerships with local communities	23

From the next page onwards, the following basic structure is used to provide information about each of these items and its description.

**[Sample]**

**1. Key CSR item from the Fujifilm Group Code of Conduct**

Overview of the key CSR item-----  
 -----  
 -----

Description -----  
 -----

**[Checklist]** --- a list of check points that can be used to check your company's initiatives

- XXXXXXXXXXXXXXXXXXXXXXXXXX
- XXXXXXXXXXXXXXXXXXXXXXXXXX

**[Note]**

The term “employee” and “worker” are used with the following meanings in this document.

- “Employee”:  
 It refers to an individual who has a work contract with and works for a company. This shall refer to full-time employees, part-time and contracted employees, and short-term part-time employees.
- “Worker”:  
 In addition to being a “Employee,” it shall refer to an individual who works in an office, factory and other workplaces based on a working relationship with a third party, and shall, in addition to “Employees,” include dispatched workers and contract company employees.

## ◆◆ Important CSR Items and Description ◆◆

### [1] Respect for Human Rights

#### 1. Respect of Human Rights

Respect basic human rights in line with laws, regulations and international standards.  
Pay due consideration so that your company's activities would not lead to the infringement of human rights either directly or indirectly.

It is important to respect human rights guaranteed under the Universal Declaration of Human Rights, other international declarations, conventions, guidelines, applicable laws, regulations and court rulings, and ensure your company does not infringe of these rights.

"Paying due consideration so that your company's activities would not lead to the infringement of human rights either directly or indirectly" refers to exploring potential human rights infringement that could occur in the supply process of raw materials related to your company's products and making efforts to identify relevant conditions.

#### [Checklist]

- Your company has a corporate policy or management statement stipulating respect for human rights.
- Your company has verified that none of the practices listed below could occur in business activities your company is involved in directly or indirectly:
  - Minerals•••Mined with child labor; Profits used to fund non-humanitarian organizations
  - Pulp / timber / plant oil•••Negatively affecting the life of people who live near plantations
  - Fuel / construction•••Exploration and plant construction infringing on the rights of indigenous people
- Your company discloses information on "conflict minerals\*" procured and used by your company in accordance with laws, regulations and customer requests.

\*About "conflict minerals":

There are concerns that mineral resources mined in the Democratic Republic of Congo (DRC) and its neighboring countries of Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia may be a source of funding for local armed groups that perpetrate violence and inhumane crimes, such as child labor, on local residents, causing serious human rights violations as well as environmental destruction.

#### 2. Respect and Promotion of Diversity

On the premise of human diversity, respect, embrace and inspire diverse personalities and individualities in your company's activities to promote producing new value.

Diversity in companies or organizations refers to establishing a business environment that respects and embraces different attributes or sense of values and actively makes use of diverse human resources.

#### [Checklist]

- Human resources of different age, gender, race, nationality, academic history, and experience work

together at your company.

- Your company has a company policy or management statement respecting and promoting diversity.
- Your company has a mechanism for promoting diversity.

### 3. Prohibition of Discrimination

Do not discriminate against people for reasons such as nationality, age, gender, sexual orientation, gender identity, race, ethnicity, religion, political belief, philosophy, place of birth or disability.

Discrimination refers to differentiating people in recruitment, promotion, remunerations and educational opportunities for reasons other than rational elements such as individual people's ability, aptitude and performance.

#### [Checklist]

- Your company does not discriminate against people in wages, promotion, remunerations or training opportunities.
- Your company makes reasonable accommodation for employees' religious practices.
- Your company does not impose medical / physical examination such as a pregnancy test that could be used in discriminatory manner on prospective employees.
- Your company has a company policy or management statement denouncing discrimination.
- Your company provides all employees with explanation about internal mechanism and procedure for eliminating discrimination.
- Your company has a mechanism that allows employees to report an act of discrimination upon identifying one.

### 4. Prohibition of Bullying and Harassment

Prohibit any act of bullying or harassment such as behaviors that injure a person's dignity or impose disadvantage or threat on a person based on gender, work authority or position (e.g. sexual harassment and power harassment).

Your workplace must be free of corporal punishment, sexual abuse, mental / physical oppression, verbal bullying, threat or other inhumane acts.

#### [Checklist]

- There is no inhumane treatment at the workplace.
- Your company has a corporate policy or management statement prohibiting inhumane treatment.
- Your company has internal initiatives for preventing inhumane treatment, such as educating employees and management on the issue.
- Your company provides all employees with explanation about internal mechanism and procedure for prohibiting inhumane treatment discrimination.
- Your company has a mechanism that allows employees to report inhumane treatment upon identifying it.
- Your company has a disciplinary procedure concerning inhumane treatment.

## 5. Protection of Privacy

Do not gather private information unrelated to work duties and business transactions from employees or customers. Do not share or disclose private information obtained through workplace or work duties without the person's clear consent.

Asking a question about matters that are not required in work duties and could lead to discrimination merely by listening or investigating may, by itself, constitute the infringement of human rights. When gathering, saving, processing, transferring and sharing personal information, make sure to comply with the requirements of laws and regulations concerning privacy and information security.

### [Checklist]

- Your company must not ask employees (or those who may gain employment) or customers any question about their political opinion, religion or sexual orientation.
- Private information obtained for work duties such as employee's health screening results and family composition must be handled appropriately in accordance with provisions set out in "7. Protection of Personal Information" in "[3] Protection / Preservation of Corporate Assets and Information" (p.21).

## 6. Promotion of Work-Life Balance

- Pay consideration to personal circumstances such as the need to care for a family member, while actively promoting the development of individual person's ability at the same time to strive to balance high work performance with a fulfilling private life.
- Work toward mitigating long working hours so that employees have time for private life and break.
- Pay employees\* the amount above the minimum wage stipulated by law.

In order to achieve good work-life balance, it is important to respect personal preference, and pay consideration to various personal circumstances such as childcare and nursing care, while actively working on developing the ability of those associated in work duties for collaboration.

It is also important to create a mechanism for accurately managing working hours and keeping them below the legal limit so that employees are not deprived of a private life and break due to extended working hours. Wages are indispensable as a means of livelihood, and it is required to pay the amount above the minimum wage stipulated by wage-related laws and regulations in your respective country or region. This includes the payment of overtime and other allowances including legal benefits.

### [Checklist]

- Your company has a corporate policy on promoting work-life balance.
- Your company manages employees' working hours accurately and objectively.
- Your company has a mechanism for ensuring that employees do not work more than the legal limit or working hours stipulated in labor-management agreement.
- Your company's weekly working hours are capped at 60 hours including overtime except for emergency situations.
- Employees take legally-defined public holidays and at least one day off in any seven-day period.
- Employees are given the right to claim paid annual leave as stipulated by laws and regulations.

- The amount of wage payment set out in an employment agreement is above the minimal level for the respective country or region.
- Overtime is paid at a rate higher than the ordinary hourly rate.
- All overtime work is voluntary and employees may refuse to do overtime.
- There is no delay in wage payment.
- Your company has a defined way of calculating wages, which is notified to workers.
- Your company distributes payslips to workers.
- Your company withholds a social insurance premium and other required amounts.
- Your company does not deduct wages as a form of disciplinary action or make unfair wage deduction.  
Example: Deducting the amount equivalent to one-day's wage for arriving one hour late to work

\*"Request to Suppliers" use the term "employees." In this section, however, "employees" refer to directly employed "workers."

## 7. Prohibition of Forced Labor / Child Labor

Do not become involved in forced labor and child labor\* of any forms including slavery, confinement and human trafficking.

Provide free choice in employment formats through a legitimate procedure, and implement required measures for preventing forced labor and child labor.

Forced labor refers to all forms of labor not undertaken by one's wishes, and include:

- 1 . Forced labor imposed on a person against their wishes
- 2 . Bonded labor in which a person's freedom to leave the job is restricted due to debt, etc.
- 3 . Slave labor resulting from human trafficking
- 4 . Inhumane prison labor under harsh conditions
- 5 . Conditions where the freedom of leaving the job is not granted
- 6 . Act of forcing employees to surrender their ID, passport or work permit

### [Checklist]

- Your company provides explanation about terms and procedures for employment and resignation to workers, and supplies an employment contract written in their respective first language.
- Your company allows workers to voluntarily leave employment if they give an advance notice in the duration stipulated by laws or regulations, once the notice period elapses.
- Your company does not retain the original copy of workers' official ID, passport, work permit, etc. unless it is stipulated by laws or regulations. If such documents are held at the company, they are returned to workers promptly upon their request.
- Your company has verified that labor dispatch services or employment agencies do not collect illegal commission or bond from prospective employees.
- Your company does not restrict workers' movements outside their working hours.

**\*What is child labor?**

Generally speaking, child labor refers to employing children under the minimum working age stipulated in the conventions and recommendations by the ILO (International Labour Organization), or failing to pay considerations toward the minor’s health, safety or moral. The table below shows required employment practices:

<Summary of required employment practices corresponding to age groups>

Age	Definition of term	Employment practice
(1) Under 15 years of age	“Children below the minimum working age” refer to those applicable to (1), (2) or (3) whichever is the highest.	Do not employ children below the minimum working age. Upon identifying child labor, provide support or implement a remedial action for the applicable child.
(2) The minimum working age stipulated by laws and regulations		
(3) Age of completing compulsory education		
Over the minimum working age permissible and below 18 years of age	Children in this category are referred to as “minors.”	Do not assign minors to work duties that may compromise their health, safety or moral.

**[Checklist]**

- Your company does not engage “children under the minimum working age” to perform work.
- Your company has a corporate policy or management statement clarifying the company’s stance against child labor.
- Your company examines public documentation to verify employees’ age.
- In employing “minors,” your company pays consideration to their health, safety and moral, and provides protection stipulated by laws and regulations (e.g. restricting their involvement in hazardous tasks and banning late night / overtime work).

**8. Promotion of Occupational Safety and Health**

Abide by laws, regulations and rules on occupational safety and health to prevent industrial accidents., Promote employees’ health and safety, and form, maintain and reinforce a comfortable working environment.

Occupational safety and health refer to corporate obligation to protect employees’ life and health from hazards while they carry out their work duties. It is important, in particular, to continuously provide information and education to employees in their respective first language or language they fully comprehend.

**[Checklist]**

- Evacuation drills are carried out inclusive of all employees.
- The company has protective equipment, required for work, in the quantity that covers all required

employees and supplies them to employees free of charge.

- The company has fire protection equipment stipulated by laws and regulations.
- The safety of all buildings is secured (by way of implementing measures against age deterioration and earthquakes).
- Your company educates employees about the safe handling of facilities, equipment and chemicals.
- Your company provides health screening stipulated by laws and regulations, and notifies results to respective workers.
- Your company eliminates or reduces risks in terms of occupational safety and health for pregnant or parenting women.
- Your company has identified work operations that cause physical strains to employees, and assesses and manages exposure to the sources of such hazards.
- Employees have access to clean toilet and drinking water at all times.
- Sufficient emergency preparedness and sanitation management are established for not only business sites but also gymnasiums, halls, canteens, dormitories and other employee-welfare facilities.
- Employees are encouraged to raise any safety and health issues without any worry of retaliation.
- Your company has a corporate policy or management statement promoting health-oriented business management.

## 9. Respect of Labor Rights

Abide by applicable laws, regulations and industry practices in respecting and not breaching workers' right to organize, right to collective bargaining and other basic labor rights.

Here, the right to organize refers to the "freedom of association," which allows workers to form and run an organization to engage in dialogs with the management on equal footing about working environment and conditions. "Organization" includes a labor union, labor affairs commission and other workers' organizations. This also includes organizations formed by occupation or industry. (Such organizations shall be referred to as "labor unions and commissions" hereinafter).

### [Checklist]

- Your company has a corporate policy that respects workers' rights to organize and join a labor union, participate in collective bargaining and peaceful gatherings, or not participate / refrain from being active in such activities.
- Your company does not obstruct, discriminate against, retaliate or harass a labor union / commission and their participants.
- The representatives of a labor union / commission are chosen in a democratic manner.
- Your company communicates amicably with a labor union / commission.
- If workers automatically join a labor union / commission upon employment, your company obtains their advance consent.
- If there is a collective bargaining agreement, your company complies with its executed provisions during the validity of the agreement.

## **[2] Fair Corporate Activities**

### **1. Active Communication**

Recognize social expectations and requests, including those from business partners and employees, and actively conduct both internal and external bi-directional communication in response.

Meeting social expectations and requests means engaging in active communication on both positive and negative matters and reflecting the outcome to business activities.

#### **[Checklist]**

- Your company has opportunities for regular communication with employees regarding their working environment including safety and health.
- Your company has an internal reporting mechanism (e.g. Hotline) for gathering information from employees about discrimination, inhumane treatment and improprieties.
- Your company has a corporate policy for protecting the identity of whistleblowers and banning retaliation against them.
- Your company has a mechanism for accepting complaints and requests from suppliers, customers, other business partners and neighborhood residents.

### **2. Information Disclosure**

Disclose corporate information including information on business activities and financial situations without tampering or falsification to fulfill accountability.

Information disclosure is about actively and accurately releasing corporate information including the company's management policy and activities to a variety of stakeholders including customers, business partners, employees, local communities, government bodies, shareholders, investors, NGOs and NPOs, to fulfill accountability with transparency.

Corporate information on business activities and fiscal situations includes information about labor management, occupational safety and health, the environment, business activities, corporate organization, fiscal conditions, business performance and risks (e.g. information on damage suffered in a major natural disaster, adverse effect caused to the environment or society, or serious breach of laws and regulations).

Fulfilling accountability refers to disclosing such information without falsification in accordance with laws, regulations and industry standards.

#### **[Checklist]**

- Your company has a mechanism for examining and verifying that the above information is recorded correctly without tampering or falsification.
- Your company discloses and reports information that is stipulated to be disclosed or reported by laws and regulations.

### 3. Fair Competition and 4. Fair Sales Activities

Engage in fair, transparent and free competition as well as appropriate trading and sales activities.

Your company must recognize the importance of free market competition and refrain from using illegitimate trading restrictions or unfair trading methods that could hinder fair competition. It is prohibited to collude with other companies in the same industry to arrange pricing, quantity and sales territories for products and services (cartel) or determine a successful bidder and bidding price in a tender process (bid rigging) as these inhibit fair competition. Furthermore, utilizing competitors' trade secret obtained illegally, making a false claim about competitors' products, and making a claim that misleads customers, are all considered to be acts of unfair competition.

It is also important to maintain an equal and fair trading relationship with customers and sales agencies.

#### [Checklist]

- Your company has a corporate policy or management statement concerning fair trading.
- Your company provides education to employees about product pricing, prohibition of collusion to avoid competition and information about fair trading.
- Your company pays consideration so that product information and advertising do not contain false or misleading claims.

### 5. Fair Procurement

Do not abuse a superior bargaining position to impose disadvantage to business partners.

It is important to avoid any acts that would raise suspicion about unfair relationships with business partners, such as receiving personal gains (money, articles, services, etc.) and abusing a superior bargaining position.

Abusing a superior bargaining position refers to using the position as a buyer or consigner to make a one-sided decision to determine or change trading terms with suppliers or impose an unreasonable demand / obligation.

#### [Checklist]

- Your company has a corporate policy or management statement banning the abuse of a superior bargaining position and promoting fair procurement activities.
- Your company provides education to employees about the ban on the abuse of a superior bargaining position.
- Your company has internal rules and mechanism for preventing the abuse of a superior bargaining position.
- In countries and regions that have laws and regulations about the abuse of a superior bargaining position, your company complies with these laws and regulations.

Example: The Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors in Japan

## 6. Prevention of Corruption

Deal with public servants and government officials with prudence and detailed consideration and do not engage in acts of corruption.

It is not allowed to offer money, entertainment, gifts or other benefits and conveniences to public servants and other similar individuals (hereinafter “public servants”) in exchange for some business rewards such as obtaining or maintaining licenses and contracts or gaining undisclosed information, as this constitutes bribery. Even when not seeking business rewards, it is considered to be bribery to provide entertainment or gifts greater than social courtesy to public servants. Note that it is illegal to offer political donations in exchange for some business rewards, as described above, or do so without following a legitimate procedure.

### [Checklist]

- Your company has a corporate policy or management statement declaring zero tolerance for any forms of bribery, corruption, blackmail or embezzlement.
- Your company provides education to employees on preventing corruption.
- Your company has an internal mechanism for checking that no inappropriate payment is made.
- When offering a political donation, your company follows a legitimate procedure in accordance with laws, regulations and business ethics of the respective countries or regions.

## 7. Prohibition of Bribery and Restriction on Gift-Exchange and Entertainment

In order to maintain healthy relationships with business partners or clean relationships with public servants and politicians, refrain from giving or receiving gifts that would raise doubt on fairness, providing entertainment, political donations, other donations, sponsorship payment or kickback in exchange for contracts.

Gift exchange and entertainment that would raise doubt on fairness include the following:

1. Offering premiums, prizes, prize money, etc. to customers or receiving them from business partners beyond the scope stipulated by laws and regulations
2. Engaging in acts of bribery nature such as offering or receiving money, goods or entertainment beyond the scope of social courtesy
3. Engaging in insider trading involving the sale or purchase of company shares based on undisclosed important information

### [Checklist]

- Your company ensures that the value and frequency of gifts and entertainment, offered to or received from customers or suppliers, are within the scope of social conventions and not excessive.
- Your company has a corporate policy or internal regulation that ensures the above is adhered to, and provide such education to employees.
- Your company has an investigating and supervising mechanism for identifying exchange of unfair advantages.

## 8. Prohibition of Ideological / Religious Activities in Our Roles as Executives and Employees

Do not engage in activities supporting or opposing a specific political party, political organization, political candidate, ideological organization, religious organization, etc. in the capacity as a company director or employee.

Refrain from engaging in political activities, ideological activities, missionary activities for a specific religion, or canvassing activities for the benefit of a specific individual or organization within the company. Also refrain from engaging in such activities outside the company in the capacity as a company director or employee.

### [Checklist]

- Your company has a corporate policy concerning political, ideological and religious activities.
- Your company has internal regulations to ensure the above is adhered to, and provides such education to employees.

## 9. Rejection of Organized Crime

Eliminate any association with anti-social and illegal forces and groups that threaten social order and safety, and do not engage in activities that would benefit such forces and groups.

In Japan, anti-social forces refer to organized crime groups and similar organizations.

For other countries, anti-social forces refer to criminals and terrorists listed in a trade ban list, financial sanctions list or list of serious offenders and terrorists, released by government organizations of various countries and regions, and companies which clear association with them.

### [Checklist]

- Your company has a corporate policy or management statement for eliminating any association with anti-social and illegal forces.
- Your company investigates business partners to ensure no benefits are provided to anti-social and illegal forces.
- Your company takes a firm stance against anti-social and illegal forces' acts of "interceding in civil disputes" with the use of violence, threat, harassment and other unjust means to gain illegitimate benefits from citizens and companies.

## 10. Compliance with Trade Control Regulations

Comply with import / export laws and regulations in relevant countries or regions concerning the importation / exportation of all freight, technologies and software or the disclosure of related technological information (including technological guidance) to external parties.

Technologies and goods controlled under laws and regulations are parts, products, technologies, facilities, software, etc. subject to legal export restriction based on international agreements (such as the Wassenaar Arrangement). There are cases where importation and exportation require legally-required procedures such as obtaining a license from a supervisory authority.

**[Checklist]**

- Your company investigates laws and regulations of relevant countries and regions prior to importation / exportation and follows necessary procedures.
- Your company provides necessary information accurately to invoices and customs declarations.
- Your company identifies appropriate countries of origin in accordance with importing countries / regions' country-of-origin regulations.

**11. Accuracy of Financial Reporting and Appropriate Tax Payments**

Strive to ensure accuracy in accounting records and financial reporting associated with business activities, and do not engage in acts of intentional tampering or falsification. Comply with taxation laws of countries and regions you conduct business in as well as international rules, and pay taxes appropriately.

It is important to appropriately process expenses, accounting and taxation in accordance with relevant laws, regulations, corporate accounting principles and accounting standards.

**[Checklist]**

- Your company has a corporate policy or internal regulation for ensuring appropriate financial reporting and tax payment.
- Your company has built and maintained an appropriate internal control structure for ensuring accuracy in financial reporting.
- Your company pays attention to taxation laws of countries and regions you operate in, so as to ensure appropriate tax payment.

**12. Quality Assurance/Safety of Products and Services**

Pay sufficient consideration to quality and safety assurance in providing products and services to the market.

In designing products at your company's responsibility, secure a sufficient level of product safety and pay consideration to responsibility as a manufacturer in marketing the products. Also pay consideration to legal compliance concerning product safety and the assurance of safety that products should ordinarily provide. Japanese laws concerning product safety include the Electrical Appliance and Material Safety Act and the Consumer Product Safety Act. Safety standards are stipulated as bylaws of laws and regulations or under JIS. International safety standards include the IEC standards and ISO standards, which provide the basis for safety standards in various countries and regions.

Assurance of product safety includes managing traceability (history of materials, parts and processes) and making swift responses to solve issues.

**[Checklist]**

- Your company has a corporate policy or internal regulation concerning quality assurance and the safety of products and services.
- Your company has internal standards concerning the safety of products and services.

- Your company provides such education about the safety of products and services to employees.

### 13. Responsible Marketing

Conduct advertising and marketing activities that communicate information about products and services to consumers and customers faithfully and accurately.

In displaying or providing information about products and services or engaging in advertising activities, make sure to comply with relevant laws and regulations in the applicable countries and regions, pay consideration to safety and social ethics, and use accurate expressions that are easy to understand.

#### [Checklist]

- Your company has a corporate policy or internal regulation concerning responsible marketing.
- Your company has developed and maintained an internal structure for verifying compliance with relevant laws and regulations.

## **[3] Protection / Preservation of Corporate Assets and Information**

### 1. Effective Use of Corporate Assets

Actively and effectively utilize tangible and intangible corporate assets for developing and supplying products and services.

The use of tangible and intangible corporate assets, which are management resources, is an effective way of delivering products and services required by society. In order to promote business activities through the use of corporate assets, it is necessary to build an overall management system.

#### [Checklist]

- Your company has obtained a third-party certification on the management system required for business activities (in response to a request from customers, for example).
- \*For more information about a management system, go to “[5] Others” – “1. Promotion of Management Systems” (P. 24).

### 2. Prohibition of Improper Use of Corporate Assets

Appropriately manage and use corporate assets, ensuring that they are not abused, e.g. used for personal gain or for illicit purposes.

It is important to appropriately manage and use tangible and intangible corporate assets such as products, facilities, fittings, information and intellectual properties, ensuring to prevent illicit use.

#### [Checklist]

- Your company has a corporate policy or internal regulation that prohibits illicit use of corporate assets.
- Your company has a mechanism for verifying that corporate assets are not used for illicit purposes.
- Your company provides education to employees on the appropriate use of corporate assets.

### 3. Prohibition of Conflicts of Interest

Do not sacrifice the company's benefits for personal gain or for the benefit of family, friends or acquaintances, e.g. engaging in an act that directly competes with the company, becoming involved in such an act, or working for a competitor.

Prioritizing personal gain or engaging in an activity that disadvantages the company constitutes a conflict of interest and could be deemed as an illegal or unethical act.

#### [Checklist]

- Your company has a corporate policy or internal regulation that prohibits acts of the conflict of interest.
- Your company has an internal mechanism for appropriately preventing any act of the conflict of interest.
- Your company provides education to employees concerning the conflict of interest.

### 4. Prohibition of Insider Trading

Do not engage in acts for personal gain, e.g. trading shares, bonds and other securities based on undisclosed information obtained due to a work position or gained from business partners specifically because of the work position (insider trading).

It is illegal to trade shares, etc. based on important undisclosed information or supply such information to a third party who trades shares, etc.

#### [Checklist]

- Your company has a corporate policy or internal regulation that bans insider trading.
- Your company has a mechanism for conducting appropriate monitoring to prevent insider trading.
- Your company provides education to employees on insider trading.

### 5. Protection of Confidential Information

Be conscious about the fact that confidential information about your company and business partners constitutes important corporate properties and should be managed and protected appropriately.

For companies, confidential information refers generally to information disclosed in documents (including data recorded electromagnetically and optically) that are agreed upon as being confidential information, and information disclosed verbally with notification that it is confidential information.

Appropriate management and protection refer to the act of preventing illicit or unjust acquisition, usage, disclosure or leakage of confidential information.

#### [Checklist]

- Your company has a corporate policy or internal regulation concerning the handling of confidential information.
- Your company provides education to employees concerning the handling of confidential information.
- Your company conducts investigation and surveillance to examine that confidential information is appropriately managed and protected.
- Confidential information provided by the Fujifilm Group is appropriately managed in accordance with a confidential agreement or a pledge of confidentiality.

## 6. Protection of Others' Intellectual Property

Do not use illicit means when obtaining and using others' undisclosed information. Respect and do not infringe on other companies' intellectual property rights.

Intellectual property rights refer to patent right, utility model right, design right, trademark right, copyright, trade secret, etc.

When developing, producing, marketing and supplying products and services, it is necessary to thoroughly investigate third party's intellectual properties in advance. The unauthorized use of a third party's intellectual properties constitutes infringement of intellectual property rights unless there is a just reason to do so. Illegal duplication, etc. of computer software and other copyrighted materials also constitutes the infringement of intellectual property rights. Similarly, obtaining and using a third party's trade secret in illegal means constitute the infringement of intellectual property rights.

### [Checklist]

- Your company conducts preliminary investigation required to determine whether your company's business activities infringe on a third party's intellectual property rights.
- Your company complies with laws and regulations when obtaining and using a third party's intellectual properties.
- Your company provides education to employees about respect for intellectual property rights.

## 7. Protection of Personal Information

Recognize the importance of personal information and handle it appropriately in compliance with applicable laws and regulations during collection, recording, management, usage and disposal.

Personal information refers to information about a living person, containing the person's name, date of birth or other description that can be used to identify the specific individual. This includes information that can be easily matched against other information for identifying the specific individual.

Appropriate handling refers to not obtaining, using, disclosing or leaking personal information illicitly or unjustly.

### [Checklist]

- Your company has a corporate policy or internal regulation concerning the handling of personal information.
- Your company provides education to employees concerning the handling of personal information.
- Your company conducts an investigation or surveillance to verify that personal information is appropriately managed and protected.

## 8. Crisis Management

Carry out organizational risk management in preparation for emergencies such as natural disaster, terrorism and cyberattack.

Risk management refers to a series of processes from identifying various risks associated with business, to analyzing and assessing the risks from the perspective of frequency and impact, and implementing

countermeasures according to the risk level. It also includes, when a risk eventuates, conducting activities to minimize the impact on and damage to associated stakeholders while prioritizing the safety of employees and area residents.

**[Checklist]**

- Your company has a mechanism for ensuring risk management.
- Your company has a mechanism concerning response to risks when they eventuate.
- Your company has a plan for maintaining the continuation of business at the time of emergency (BCP: Business Continuity Plan).

#### **[4] Measures Related to Environmental Issues**

##### **1. Response to Climate Change**

Recognize the fact that climate change is progressing as a global environmental issue, and actively promote, in all areas of business activities, initiatives for reducing the emission of greenhouse gasses and mitigating the impact of climate change so as to build a decarbonized society.

Greenhouse gasses refer to carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and other gasses contained in the atmosphere, and include nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorinated carbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>).

**[Checklist]**

- Your company has a corporate policy or management statement concerning response to climate change and reduction of greenhouse gas emission.
- Your company records the amount of greenhouse gasses generated or used at your business sites.
- In order to reduce energy consumption and greenhouse gas emission, your company is implementing initiatives under voluntary targets, which reflect voluntary reduction targets in countries and regions your company conducts business in.
- Your company promotes the use of renewable energy.

##### **2. Contribution to a Circular Economy**

Recognize the fact that resources are limited, and further promote saving, reusing and recycling resources so as to work toward establishing a circular economy.

Promote the concept of 3R (reducing, reusing and recycling waste) and comply with laws and regulations concerning waste disposal. 3R refers to reducing (reducing the amount of waste generated), reusing and recycling.

**[Checklist]**

- Your company has a corporate policy or management statement concerning 3R on waste.
- Your company records the total amount of waste generated and recycled annually.
- Your company is working toward specific targets for reducing waste.

- When commissioning an external service for collecting, transporting and disposing of industrial waste\*, your company has a mechanism for preventing illegal waste dumping and ensuring appropriate disposal, and takes records on these activities.

\*What is industrial waste?

Cinders, sludge, waste plastic and other types of waste generated through business activities, as stipulated by laws and regulations in many countries and regions

### 3. Safety and Effective Use of Chemicals

Implement necessary countermeasures to prevent adverse impact on human health and the environment with regard to the development, production, usage and disposal of chemical substances. On this premise, make maximum use of the usefulness of chemical substances to solve various social issues.

The Fujifilm Group has Green Procurement Standards, aimed at ensuring the reduction of environmental impact and safety assurance of products and chemical substances across the entire product lifecycle. It has released the Standards and is working on building a structure for appropriate management of chemical substances contained in products.

Appropriate management of chemical substances contained in products refers to not only ensuring that products do not contain chemical substances banned under laws and regulations, but also complying with labeling obligations required, carrying out required testing and evaluation, and providing information about contained chemical substances subject to management.

#### [Checklist]

- Your company has a corporate policy or internal regulation concerning the safety assurance of chemical substances.
- Your company complies with the “Fujifilm Green Procurement Standards.”
- Your company provides internal education required concerning the “Fujifilm Green Procurement Standards.”

- Fujifilm Green Procurement Standards :  
<https://www.fujifilm.com/jp/en/about/sustainability/procurement>

### 4. Protection of Local Environments and Partnerships with Local Communities

Collaborate with various stakeholders as a member of local community to work on preserving the atmosphere, soil and water, reducing noise, vibrations and foul odor, and conserving biodiversity. Make sure to abide by relevant environmental laws and regulations.

In order to ensure sustainable use of natural resources such as water and forests, and conserve biodiversity, it is important to implement various measures such as usage restriction and clean-up activities. Sustainable use of natural resources refers to efficiently using and reusing limited resources and recycling

them in a sustainable form. Conserving biodiversity refers to ensuring the diversity of living species and systems, and maintaining the balance of ecosystems, so as to maintain ecosystem services (provisioning, regulating, cultural and supporting services) that the human race receives into the future. It is intended to protect and manage wildlife, and conserve their habitat, while, in using ecosystem services, averting or minimizing any impact on biodiversity.

Japan has various environmental laws and regulations for preventing environmental pollution, built on the Basic Act on the Environment as the fundamental philosophy. There are also cases whereby regional treaty stipulates separate standards. Overseas, various countries and regions have their laws, regulations and guidelines for preventing environmental pollution. Complying with environmental laws and regulations encompasses identifying all environmental laws and regulations associated with business activities comprehensively, and building a mechanism for verifying compliance status.

#### [Checklist]

- Your company investigates the risks of water resources becoming contaminated or depleted in your business regions.
- Your company has voluntary targets on water pollution prevention, water saving and reusing, and is actively working toward them.
- Your company procures pulp and timbers from suppliers that have obtained forest certification such as FSC (Forest Stewardship Council) or are promoting equivalent initiatives.
- Your company complies with environmental laws and regulations, and has a mechanism for verifying compliance status.
- Your company has a mechanism for obtaining and responding to the most up-to-date information about legal introduction and amendments.
- Your company confirms not to pollute or contaminate the atmosphere, water or soil.

## **[5] Others**

### 1. Promotion of Management Systems

Build a mechanism for examining and improving business activities, including risk management, based on international standards and specifications on management systems concerning labor affairs, ethics, occupational health and safety, environmental conservation and quality control.
---

A management system refers to an overall management mechanism for promoting business activities, and encompasses organizational structure, systematic activities, distribution of responsibility, business practices, procedures, processes and management resources. It is important to draw up a policy on labor affairs, ethics, occupational health and safety, environmental conservation, quality control, etc., and implement, review and maintain measures formulated in line with the policy to achieve continuous improvement through the so-called PDCA (Plan-Do-Check-Act) cycle.

**[Checklist]**

- Your company incorporates the mechanism of management systems concerning labor affairs and ethics (e.g. SA8000), industrial safety (e.g. ISO45001), environmental conservation (e.g. ISO14001, Eco Action 21), quality control (e.g. ISO9001) and information security (e.g. ISO27001, ISMS and P-Mark).

**2. Notification of the Importance of Promoting CSR**

Notify the importance of promoting CSR to employees, business partners and stakeholders associated with business activities.

In order to promote sustainable procurement activities across the entire supply chain, it is important to notify the significance and importance of such activities not only within the company but also to business partners and beyond, and work together with them. Make sure to notify the contents of these Guidelines to your relevant employees and business partners, and secure their cooperation in promoting initiatives for sustainable procurement activities.

**[Checklist]**

- Your company notifies the contents of these Guidelines to your company's relevant employees.
- Your company notifies the contents of these Guidelines to your company's suppliers and contractors, and requests their cooperation in sustainable procurement.
- Your company examines CSR initiatives of your company's suppliers, contractors and other business partners.

**<Inquiry Regarding Sustainability Activities>**

Please visit the website below to provide your opinions or make queries about sustainability-related matters at the Fujifilm Group including the environment, ethics, compliance, human rights and supply chain.

- <https://holdings.fujifilm.com/en/contact>

#### **IV. Reference Materials**

We referred to the following materials regarding terminology, expressions and checklist standards to reflect societal demands from a global perspective in the creation of this document.

- 1) Universal Declaration of Human Rights adopted by the United Nations General Assembly on 10 December 1948
- 2) UN Guiding Principles on Business and Human Rights
- 3) ISO26000 (JISZ26000) (Guidance on social responsibility)
- 4) The Ten Principles of the UN Global Compact
- 5) Ethical Trading Initiative (ETI) Base Code
- 6) Convention on the Rights of the Child
- 7) OECD Guidelines for Multinational Enterprises
- 8) ILO Declaration on Fundamental Principles and Rights at Work
- 9) RBA (Responsible Business Alliance) Code of Conduct
- 10) JEITA (Japan Electronics and Information Technology Industries Association) Responsible Business Conduct Guidelines

#### **<< Revision History >>**

Date	Ver.	Details
February 2015	1.0	Established Fujifilm Procurement Guidelines for Suppliers.
March 2022	2.0	- Revised to reflect the modified structure of the Fujifilm Group Code of Conduct - Renamed to “Fujifilm Group Sustainable Procurement Guidelines for Suppliers”