

**Fujifilm Group  
Sustainable Procurement Guidelines  
for Suppliers**

**Ver.3.01**

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FUJIFILM Holdings Corporation**

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## I. Introduction

The Fujifilm Group, guided by its Group purpose of “Giving our world more smiles,” strives to be a company that contributes to building a sustainable society by addressing social challenges through innovative technologies, products, and services.

In recent years, numerous social issues—such as climate change and human rights—cannot be resolved by any single company alone. In particular, tackling challenges within the supply chain requires close collaboration with our business partners to collectively address these issues across the entire supply chain.

The Fujifilm Group expects all business partners who provide products or services to the Group (hereinafter referred to as “Suppliers”) to recognize the importance of corporate responsibility in areas including the environment, human rights, labor, occupational health and safety, and corporate ethics, and to work together with us to promote solutions to these challenges.

We have previously requested our suppliers’ understanding and cooperation with the Fujifilm Group’s principles and policies, including the “Fujifilm Group Charter for Corporate Behavior and Code of Conduct.” In December 2025, we newly established the “Fujifilm Group Supplier Code of Conduct.”

This document, the “Fujifilm Group Sustainable Procurement Guidelines for Suppliers,” serves as a guide to help suppliers better understand the specific actions we would like you to implement. Since its first edition in 2015, we have updated to reflect evolving social demands. With the publication of the “Fujifilm Group Supplier Code of Conduct,” we are now releasing the third edition. In this revision, the structure has been reorganized to align with the chapter and section layout of the “RBA (Responsible Business Alliance) Code of Conduct,” a widely recognized international standard for responsible business practices in global supply chains, consistent with the new “Fujifilm Group Supplier Code of Conduct.”

This guideline provides explanations of important terms and checklists for self-assessment to promote activities. We encourage you to make full use of it.

We appreciate your continued understanding and cooperation in the sustainable procurement activities that the Fujifilm Group aims to achieve.

December 2025  
FUJIFILM Holdings Corporation

## II. Request Items and Self-Assessment Checklist

Request Items Emphasized in the “Fujifilm Group Supplier Code of Conduct” and Corresponding Explanation Pages in This Guideline

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**Basic Structure of Each Requirement**

The following pages provide the explanation and details for each item, structured as follows:

[Sample]

(1) Title of the “Request Item”

Overview of the “Request Item”

Description

[Checklist]

These checklists highlight points that we hope you will utilize in reviewing your company's initiatives.

## A. Labor

### ( 1 ) Prohibition of Forced Labor

In employment, free will of all employees shall be respected, and no employee shall be subjected to forced labor.

Any form of forced labor\* is not permitted, including slave labor, bonded labor (including debt bondage), involuntary or exploitative prison labor, and human trafficking. This also includes the transfer, harboring, recruitment, transportation, or receipt of persons by means of threat, coercion, abduction, or fraud for labor or services. All labor must be voluntary, and measures must be taken to ensure workers' freedom to resign and freedom of movement, as well as to provide clear employment contracts and necessary protections for workers' rights.

Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

#### [Definitions]

\* Forced labor: Refers to all labor not undertaken of one's own free will, such as:

- Forced labor imposed against the individual's will
- Debt bondage where freedom to leave is restricted for repayment
- Slave labor resulting from human trafficking
- Inhumane prison labor under harsh conditions
- Situations where the right to freely resign is not granted
- Requiring workers to deposit identification documents, passports, or work permits with the employer

#### [Checklist]

- Your company clearly states the prohibition of forced labor in its company policies or declarations.
- Your company specifies in work rules and employment contracts that workers are free to resign without penalty, provided reasonable notice is given.
- Your company provides workers with a written employment contract at the time of hiring, clearly stated in their native language or a language they can understand.
- Your company provides foreign migrant workers with an employment contract before departure, and any replacement or modification of the contract in the receiving country is permitted only if it complies with laws and offers better conditions.
- Your company does not impose unreasonable restrictions on entry to or exit from company-provided dormitories, residences, or other facilities, nor on movement within such facilities.
- Your company does not retain, confiscate, or conceal original copies of workers'

official identification documents, passports, or work permits, except where required by law. Even when retention is necessary, your company ensures that workers have free access to these documents.

- Your company prohibits workers from bearing recruitment fees or any other related fees in connection with employment, including cases where workers are hired through contractors or recruitment agencies, and takes reasonable steps to confirm that no unjust fees have been imposed on workers.

Example confirmation methods:

- Interviews with foreign migrant workers employed at your own factories
- Written surveys or audits directed at recruitment agencies

- Your company has rules or procedures to address and remediate situations where workers may have been unjustly charged recruitment fees or related costs.

Example remediation approaches:

Collaborating with your direct suppliers to investigate the facts and, where appropriate, encouraging relevant parties in the supply chain to reimburse affected workers

- Your company does not restrict workers' freedom of movement outside of working hours.
- Your company appropriately stores and manages information and related documents of retired workers.

## ( 2 ) Young Workers

Do not employ children below the minimum working age, nor allow work that may harm the development of minors.

Child labor\* is not permitted at any stage of manufacturing. For workers under 18 years old (Young Workers), employment in work that may endanger health or safety, such as night shifts or hazardous work, is prohibited and must be properly managed. Suppliers must comply with applicable laws, manage records of student workers, cooperate with educational institutions, protect rights, and establish mechanisms to verify workers' ages.

[Definitions]

\* Child labor: In general, employing children who are below the minimum working age set by ILO (International Labour Organization) conventions and recommendations, or neglecting considerations for the health, safety, or morals of young workers, is prohibited.

The actions summarized in the table below are required to address this issue.

<Summary of required employment practices corresponding to age groups>

Age	Definition	Response
(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		
(4) Over the minimum working age permissible and below 18 years of age (minors)	Children in this category are referred to as “Young Workers.”	Do not assign minors to work duties that may compromise their health, safety or moral.

[Checklist]

- Your company does not employ children below the minimum working age in any business activities.
- Your company clearly states the prohibition of child labor in its company policies and declarations.
- To prevent child labor, your company verifies workers’ ages using official documents and manages these records appropriately.
- Your company does not assign minors under the age of 18 to night shifts, overtime work, or hazardous duties.
- Your company complies with applicable laws regarding student workers, conducts due diligence on partner educational institutions, and strives to protect students’ rights.
- In cases where there are no applicable local laws for the wage rate for student workers, interns, or trainees, your company pays wages equal to or higher than those paid to other new workers performing similar tasks.
- Your company operates workplace learning programs in full compliance with all relevant laws and regulations.
- If child labor is identified, your company promptly implements support and remediation measures.

**( 3 ) Working Hours**

Manage employees’ working hours, holidays, and leave appropriately so as not to exceed legal limits.

Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or



unusual situations.

All overtime must be performed with the voluntary consent of the workers. Workers shall be allowed at least one day off every seven days.

#### [Checklist]

- Your company complies with local laws and regulations regarding working hours and overtime.
- Your company appropriately manages working hours to ensure that, except in cases of emergency or exceptional circumstances, total weekly working hours including overtime do not exceed 60 hours.
- All overtime work is performed with the voluntary consent of workers.
- Your company provides workers with at least one day off in every seven-day period, and ensures the granting of legally mandated annual paid leave.
- Your company has established systems to objectively and accurately record and manage working hours.

## ( 4 ) Wages and Benefits

Pay employees at least the statutory minimum wage and do not make unfair wage deductions.

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In addition to abiding by the local minimum wage laws of each country and region, suppliers are expected to recognize the importance of suitable wages that enable workers to maintain a healthy and culturally adequate standard of living.

Deductions from wages as a disciplinary measure shall not be permitted\*. Methods of wage calculation and statements must be properly provided to workers. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

#### [Explanation]

\* Why Deductions from Earned Wages for Disciplinary Purposes Are Not Permitted: Compensation for work already provided belongs to the worker as a basic labor right. Therefore, the reduction of earned wages due to disciplinary reasons is regarded as an unjust violation of this right and is prohibited under labor laws in numerous countries. However, if a disciplinary process such as suspension takes place and an employee does not work during that time, it is acceptable that no payment is made for days absent.

#### [Checklist]

- Your company pays workers at least the minimum wage or higher, as stipulated by the laws of the country or region where it operates.
- Your company takes measures to ensure equal pay for work of equal value.

- Your company pays a premium wage for overtime work, which is higher than the regular wage.
- Your company clearly states in regulations or employment contracts that wage deductions as a disciplinary measure are not permitted.
 

➤ Note: Wage deductions for suspension periods based on disciplinary rules do not constitute unjust wage deductions.
- Your company does not make unjust wage reductions.
 

➤ Example: Deducting a full day's wage for being one hour late is considered an unjust wage reduction.
- Your company documents the wage calculation method and ensures that workers are informed of it.
- Your company provides accurate and timely pay statements so that workers can confirm the details of their payments.
- Your company pays wages without delay.
- Your company properly carries out statutory withholdings such as social insurance premiums.
- For temporary, dispatched, or outsourced workers, your company sets employment conditions, work periods, and treatment in accordance with local legal restrictions, and does not impose unfair discrimination or unreasonable working conditions.

## ( 5 ) Non-Discrimination/Non-Harassment/Humane Treatment

Prohibit all forms of discrimination/harassment/inhumane treatment and create a workplace environment of mutual respect.

Suppliers must prohibit all forms of discrimination and harassment\*, including the examples below, and commit to creating a workplace environment of mutual respect. Disciplinary policies and procedures corresponding to these requirements must be clearly defined and communicated to workers. Reasonable accommodation must be provided for workers' religious practices and disabilities. Workers must not be subjected to medical or physical examinations, such as pregnancy or virginity tests, that could be used in a discriminatory manner.

\* Examples of discrimination and harassment:

- Violence, gender-based violence, sexual harassment, power harassment, sexual abuse, corporal punishment, psychological or physical oppression, bullying, public humiliation, verbal abuse, and other unpleasant or inhumane treatment
- Discrimination or harassment in recruitment and employment practices, such as wages, promotion, compensation, and training opportunities, based on race, color, age, gender, sexual orientation, gender identity/expression, ethnicity/nationality, disability, pregnancy, religion, political affiliation, union membership, military service, genetic information, or marital status

**[Checklist]**

- Your company has a clear company policy and declaration prohibiting discrimination and harassment.
- Your company does not subject workers to any inhumane treatment, such as violence, sexual abuse, corporal punishment, mental or physical oppression, bullying, public humiliation, or verbal abuse.
- Your company eliminates discriminatory treatment based on race, gender, age, sexual orientation, gender identity, ethnicity, religion, political beliefs, disability, pregnancy, etc.
- Your company ensures there is no discrimination in wages, promotion, treatment, or access to education and training opportunities.
- Your company provides reasonable accommodations for religious practices and disabilities.
- Your company does not conduct medical examinations that could be used for discriminatory purposes, such as pregnancy tests or virginity tests.
- Your company regularly conducts internal training and awareness activities to prevent discrimination and harassment.
- Your company has established a system that allows workers to report inhumane treatment or discriminatory acts when discovered.
- Your company clearly defines disciplinary procedures and measures, and ensures all workers are informed of them.
- Your company creates an environment where diverse personnel can work, regardless of age, gender, race, nationality, educational background, or experience.

**( 6 ) Freedom of Association and Collective Bargaining**

Respect employees' right to organize and do not force or restrict union activities.

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

In accordance with applicable laws and established practices, suppliers shall respect and uphold fundamental labor rights, including workers' rights to organize\* and bargain collectively, and shall also respect the right of workers to refrain from such activities. Where the labor rights are restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

**[Definitions]**

\* The right to organize (freedom of association):

The right of workers to voluntarily organize and operate organizations to engage in dialogue with the company on an equal footing regarding working conditions and

treatment. Organizations include labor unions, worker committees, and other worker organizations, not only at the company level but also at the occupational or industry level.

**[Checklist]**

- Your company has a policy that respects workers' rights to form and join labor unions, participate in collective bargaining, and take part in peaceful assemblies, as well as the right not to engage in such activities.
- Your company does not interfere with, discriminate against, retaliate against, or harass labor unions, committees, or their participants.
- Your company ensures that representatives of labor unions or committees are selected through democratic processes.
- Your company establishes good communication between labor unions or committees and the company.
- If workers are automatically enrolled in a labor union or committee upon employment, your company obtains their prior consent.
- If a collective bargaining agreement exists, your company complies with all agreed terms during its effective period.
- Your company creates an environment where workers can freely express their opinions and concerns and communicate openly with management.

## **B. Health and Safety**

### **( 1 ) Occupational Health and Safety**

Identify and assess health and safety risks, and take appropriate measures to reduce the risk of occupational accidents and health hazards.

Potential health and safety hazards must be appropriately identified and assessed, and effective measures to reduce risks must be taken based on the concept of the Hierarchy of Controls\*. This includes providing information on risks and supplying properly maintained personal protective equipment. Gender-responsive measures are also essential, such as ensuring that pregnant and nursing women are not exposed to work environments that may affect their health, and providing reasonable accommodation.

#### **[Definitions]**

\* Hierarchy of Controls:

In workplace risk management, this concept involves considering and implementing measures to protect workers from occupational health and safety hazards and to reduce risks, prioritizing those with the highest preventive effectiveness.

#### **[Checklist]**

- Your company complies with applicable laws and internal regulations regarding occupational health and safety, and is committed to preventing workplace accidents and managing health and safety.
- Your company identifies and assesses workplace risks (such as chemicals, electricity, machinery, fire, falling objects, etc.) and implements measures based on the hierarchy of controls.
- Your company provides workers with appropriate personal protective equipment free of charge, ensures it is properly maintained, and instructs workers in its correct use for hazardous tasks.
- Your company takes reasonable measures to ensure that pregnant and nursing workers avoid environments that may affect their health.
- Your company installs fire safety equipment as required by law and ensures building maintenance and earthquake resistance.
- Your company conducts regular evacuation drills and strives to raise workers' safety awareness.
- Your company conducts legally mandated health checkups and appropriately notifies workers of the results.

## ( 2 ) Emergency Preparedness

Prepare for potential disasters and accidents, and establish and communicate emergency response measures in the workplace.

Potential emergencies and their impacts must be identified and assessed in advance, and emergency response and procedures must be established and implemented to enable prompt and appropriate action in the event of an emergency. This includes emergency reporting, worker notification, evacuation procedures, and employee training. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

### [Checklist]

- Your company identifies and assesses potential emergencies and risks.
- Your company has established a system for reporting emergencies and methods for informing workers.
- Your company clearly defines evacuation procedures and ensures that workers are informed of them.
- Your company conducts disaster drills at least once a year or at a higher frequency if required by local law.
- Your company properly installs and maintains fire alarms and fire extinguishing equipment.
- Your company ensures that emergency exits are clearly marked and kept free of obstructions.
- Your company manages contact information for personnel responsible for emergency response.
- Your company has developed an emergency recovery plan and established a system to implement it.
- Your company has emergency response procedures that emphasize minimizing damage to life, the environment, and property potentially affected by disasters or accidents.

## ( 3 ) Occupational Injury and Illness

Establish procedures and systems, including corrective actions, to prevent and manage occupational injuries and illnesses.

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without

fear of retaliation.

**[Checklist]**

- Your company encourages the reporting of occupational accidents and illnesses and creates an environment where such reporting is easy.
- Your company classifies, records, and manages cases of occupational accidents and illnesses appropriately.
- Your company promptly provides necessary medical care and treatment for occupational accidents and illnesses.
- Your company investigates the causes and ensures the implementation of corrective measures to prevent recurrence.
- Your company guarantees workers the right to remove themselves from imminent danger and to refrain from returning to work until the environment is safe.
- Your company maintains a system that allows workers to report hazards without fear of retaliation.

**( 4 ) Industrial Hygiene**

Identify, assess, and manage exposure to chemical, biological, and physical factors in the workplace.
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Worker exposure to chemical, biological, and physical agents that directly affect the body shall be identified, evaluated, and mitigated to reduce risks according to the Hierarchy of Controls.

When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge.

Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments.

Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

**[Checklist]**

- Your company identifies and assesses chemical, biological, and physical risks that may affect workers.
- Your company implements risk reduction measures based on the hierarchy of controls.
- For risks that are difficult to manage, your company provides appropriate and properly maintained personal protective equipment free of charge and requires workers to use it.
- Your company provides a safe and hygienic working environment and conducts

continuous and systematic monitoring of health and environmental conditions.

- Your company continuously provides workers with educational programs about hazards and risks.

## ( 5 ) Physically Demanding Work

Identify, assess, and manage risks associated with physically demanding work.

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

### [Checklist]

- Your company identifies and assesses hazards related to physically demanding work.
- Your company implements appropriate risk avoidance and reduction measures for the identified hazards.
- When necessary, your company provides appropriate personal protective equipment to workers free of charge and requires its use.
- Your company regularly monitors the working environment and health of workers engaged in physically demanding tasks.

## ( 6 ) Machine Safeguarding

Implement appropriate safety measures for machinery and equipment used in the company.

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks\*, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

### [Definitions]

\*Interlock: A safety device designed to prevent hazardous machine operations. It ensures that the machine will not operate unless specific conditions are met.

### [Checklist]

- Your company assesses the safety risks of production machinery and other equipment.
- Your company installs physical guards, interlock devices, and barriers on machinery that may pose a risk of injury to workers.
- Your company properly maintains and regularly inspects machine safety devices.
- Your company regularly provides training to employees on the safe handling of



machinery.

## ( 7 ) Sanitation, Food, and Housing

Provide clean toilets, drinking water, and hygienic facilities for food and housing.

Suppliers shall provide workers with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

### [Checklist]

- Your company ensures that all workers have access to clean toilet facilities and safedrinking water.
- Your company provides appropriate facilities and equipment to ensure that meals are prepared and stored hygienically.
- Worker dormitories are maintained in a clean and safe condition.
- Worker dormitories are equipped with proper emergency exits, bathing and shower facilities with hot water, lighting, and air conditioning/ventilation.
- Your company provides secure storage facilities for workers to keep personal belongings and valuables.
- Your company provides personal space that is reasonably sized and allows for freedom of movement.
- Your company regularly evaluates the safety and hygiene management of dormitories, including those provided by recruitment agencies or subcontractors.

## ( 8 ) Health and Safety Communication

Provide health and safety information and training in a language workers can understand, and create an environment where concerns can be reported without fear.

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and

regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

**[Checklist]**

- Your company provides safety and health information about identified workplace hazards in a language that workers can understand.
- Your company clearly posts or displays safety and health information in easily accessible locations within the facility for all workers.
- Health information and training include content that addresses risks specific to gender, age, and other characteristics.
- Your company provides all workers with safety and health training before they begin work and on a regular basis.
- Your company has established a system that allows workers to easily report safety and health concerns without fear of retaliation.
- Your company continuously provides occupational health and safety education in a language that workers can understand.

## C. Environment

### ( 1 ) Environmental Permits and Reporting

Obtain administrative permits and submit required management reports to authorities in accordance with the laws and regulations of the country of operation, as necessary.

All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

#### [Checklist]

- Your company identifies all environmental permits, licenses, and registrations required for its business activities.
- Your company manages the validity periods of obtained permits and ensures they are always kept up to date.
- Your company complies with operational standards related to environmental permits and submits reports in a timely and appropriate manner.

### ( 2 ) Pollution Prevention and Resource Conservation

Comply with relevant regulations and strive to minimize environmental impact through pollution prevention and resource conservation.

Emissions and discharges of pollutants and generation of waste\* shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

#### [Definitions]

##### \* Waste:

Refers to waste materials such as ashes, sludge, and waste plastics generated from business activities, as defined by the laws and regulations of each country or region.

#### [Checklist]

- Your company minimizes the emission of pollutants and the generation of waste by controlling sources and installing pollution prevention equipment.
- Your company works on resource conservation and efficiency by improving production, equipment, and maintenance processes, using alternative materials, and promoting reuse and recycling.

- Your company has a policy or declaration promoting the 3Rs(\*) of waste management (Reduce, Reuse, Recycle).

\*3Rs: The 3Rs are the basic concepts of waste management—Reduce (waste prevention), Reuse, and Recycle.

- Your company records and manages the annual total amount of waste and the amount recycled.
- Your company sets specific waste reduction targets and works toward achieving them.
- When outsourcing the collection, transportation, or disposal of industrial waste, your company maintains systems and records to prevent illegal dumping and ensure proper handling.

### ( 3 ) Hazardous Substances

Properly manage hazardous substances to prevent harm to people and the environment.

Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

#### [Checklist]

- Your company properly identifies and clearly labels chemicals and waste that are hazardous to human health and the environment.
- Your company ensures the safe handling, transportation, storage, use, recycling or reuse, and disposal of hazardous substances.
- Your company tracks and documents data related to hazardous waste.
- Your company has established policies and internal regulations to ensure chemical safety.
- Your company complies with the Fujifilm Group “Green Procurement Standards.”\*
- Your company provides necessary internal training on the requirements included in the Fujifilm Group “Green Procurement Standards.”\*

\* The Fujifilm Group “Green Procurement Standards” :

- “Fujifilm Green Procurement Standards” (for suppliers of Fujifilm Corporation and its group companies)
- <https://www.fujifilm.com/jp/en/about/sustainability/procurement>
- “Fujifilm Business Innovation Green Procurement Standards” (for suppliers of Fujifilm Business Innovation Corp. and its group companies)
- <https://www.fujifilm.com/fb/company/policy/purchase>

## ( 4 ) Solid Waste

Appropriately manage and reduce solid waste, and dispose of or recycle it responsibly.

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Waste data shall be tracked and documented.

### [Checklist]

- Your company identifies and properly manages non-hazardous solid waste.
- Your company records and manages the annual amount of waste generated and the amount recycled.
- Your company sets specific waste reduction targets and implements initiatives to achieve them.
- When outsourcing the collection, transportation, or disposal of industrial waste to external contractors, your company maintains systems and records to prevent illegal dumping and ensure proper handling.

## ( 5 ) Air Emissions

Appropriately manage and control air emissions in accordance with laws and regulations.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge.

Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol\* and applicable regulations.

### [Definitions]

\* Montreal Protocol: An international framework adopted in 1987 with the aim of protecting the ozone layer

Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

### [Checklist]

- Your company evaluates, monitors, controls, and treats volatile organic compounds, aerosols, corrosive substances, particulates, and air pollutants.
- Your company properly manages ozone-depleting substances in accordance with the Montreal Protocol and relevant regulations.
- Your company regularly monitors and records the performance of air emission management systems.

## ( 6 ) Materials Restrictions

Comply with all legal and customer requirements regarding the restriction of specific substances in products and manufacturing.

Suppliers shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

### [Checklist]

- Your company has a system in place to stay updated on applicable laws and regulations regarding the prohibition or restriction of specific substances in products and manufacturing.
- Your company provides regular training on applicable laws and regulations regarding the prohibition or restriction of specific substances in products and manufacturing.
- Your company complies with the Fujifilm Group "Green Procurement Standards."\*
- Your company provides necessary internal training on the requirements included in the Fujifilm Group "Green Procurement Standards."\*

\* The Fujifilm Group "Green Procurement Standards" :

- "Fujifilm Green Procurement Standards" (for suppliers of Fujifilm Corporation and its group companies)
- <https://www.fujifilm.com/jp/en/about/sustainability/procurement>
- "Fujifilm Business Innovation Green Procurement Standards" (for suppliers of Fujifilm Business Innovation Corp. and its group companies)
- <https://www.fujifilm.com/fb/company/policy/purchase>

## ( 7 ) Water Management

Maintain optimal performance in water use and discharge through appropriate management such as characterization, monitoring, control, and treatment, while complying with relevant regulations.

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewaters shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems\* to ensure optimal performance and regulatory compliance.

[Definitions]

\* Wastewater Treatment System:

Refers to the equipment and processes used to remove contaminants and neutralize wastewater discharged from factories and other facilities.

[Checklist]

- Your company documents information on the use and discharge of water sources, and continuously conducts characterization and monitoring.
- Your company actively engages in water conservation and control of water contamination channels.
- Your company appropriately conducts characterization, monitoring, control, and treatment of wastewater prior to discharge, in accordance with laws and regulations.
- Your company regularly monitors the performance of wastewater treatment and containment systems, and maintains optimal operation.

## ( 8 ) Energy Consumption and Greenhouse Gas Emissions

Set and report company-wide greenhouse gas\*<sup>1</sup> reduction targets, and strive to minimize energy consumption and greenhouse gas emissions.

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas\*<sup>1</sup> reduction goal upon request by the Fujifilm Group.

Suppliers shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

Energy consumption and all Scopes 1, 2, and significant categories of Scope 3\*<sup>2</sup> greenhouse gas emissions shall be tracked, documented, and publicly reported.

[Definitions]

\*<sup>1</sup> Greenhouse gas:

A general term for gases present in the atmosphere that contribute to global warming, including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), nitrogen trifluoride (NF<sub>3</sub>), and others.

\*<sup>2</sup> Scope 1, 2, and 3:

Refers to categories of greenhouse gas emissions: direct emissions (Scope 1), indirect emissions from purchased energy (Scope 2), and other indirect emissions (Scope 3). Scope 3 covers a wide range, including the entire supply chain.

[Checklist]

- Your company has established a corporate policy or statement regarding the reduction of greenhouse gas emissions and response to climate change.
- Your company accurately tracks, documents, and manages the total greenhouse gas emissions and energy consumption of all business sites.
- Your company appropriately identifies and publicly discloses greenhouse gas emissions for Scope 1, Scope 2, and significant categories of Scope 3.
- Your company sets its own targets for greenhouse gas emission reduction, taking into account local voluntary reduction targets, and implements specific initiatives
- Your company actively promotes the introduction and use of renewable energy.



## D. Ethics

### ( 1 ) Business Integrity

Maintain the highest standards of integrity in all business interactions.

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery\*, corruption, extortion and embezzlement.

[Definitions]

\* Bribery:

Refers to the act of giving or receiving money, goods, entertainment, or other benefits with the intent to obtain an improper advantage.

#### [Checklist]

- Your company has a zero-tolerance corporate policy or statement that strictly prohibit any form of bribery, corruption, blackmail, or embezzlement.
- Your company systematically provides employee education on anti-corruption.
- Your company has established internal confirmation and audit mechanisms to prevent inappropriate payments or provision of benefits.
- Your company follows legitimate procedures in accordance with the laws and business ethics of each country or region when making political donations.
- Your company manages the value and frequency of gifts and entertainment with customers and suppliers to ensure they do not exceed socially accepted norms.
- Your company has established investigation and audit systems to detect improper provision of benefits.
- Your company prohibits bribery of public officials and government representatives, and ensures that employees are informed not to provide entertainment beyond social courtesy.
- Your company has a policy that prohibits the improper use of internal information, such as insider trading.

➤ Note: Insider trading is an illegal act of trading stocks or other securities based on material non-public information.

### ( 2 ) No Improper Advantage

Do not promise, offer, authorize, give, or accept bribes or other forms of improper or inappropriate benefits.

Bribes or other means of obtaining undue or improper advantage shall not be

promised, offered, authorized, given, or accepted.

This prohibition covers giving or accepting anything of value to obtain or retain business, or to gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

**[Checklist]**

- Your company has a corporate policy or statement that strictly prohibit any promise, offer, provision, or acceptance of bribes or improper benefits.
- Your company has established monitoring, record management, and implementation procedures to ensure compliance with anti-corruption laws and regulations.
- Your company has a corporate policy or statement that prohibit the abuse of a superior bargaining position and promote fair procurement activities.
- Your company regularly provides employee education on the prohibition of abusing a superior bargaining position.
- Your company has internal rules and mechanisms to prevent the abuse of a superior bargaining position.
- Your company complies with laws and regulations regarding the abuse of a superior bargaining position in countries and regions where such laws and regulations exist.
- Your company regularly confirms and audits that fair and transparent transactions are conducted with business partners.

**( 3 ) Disclosure of Information**

Conduct all business transactions transparently and accurately reflect them in the supplier 's books and records.
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All business dealings shall be transparently performed and accurately reflected on the Supplier's business books and records.

Suppliers shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices are unacceptable.

**[Checklist]**

- Your company has a mechanism to inspect and verify that all information, including business transactions, is recorded and managed accurately without falsification or misrepresentation.
- Your company appropriately discloses and reports information in accordance with

legal requirements.

- Your company discloses information related to labor, health and safety, environmental activities, finance, and business operations with transparency, in accordance with applicable laws and industry practices.
- Your company actively and accurately communicates management policies and activities to stakeholders and fulfills its accountability.

#### ( 4 ) Intellectual Property

Respect intellectual property rights and ensure the proper handling and protection of technology and information.

Intellectual property rights\* shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

[Definitions]

\* Intellectual property rights:

Refers to rights such as patent rights, utility model rights, design rights, trademark rights, copyrights, and trade secrets.

#### [Checklist]

- Your company appropriately conducts necessary preliminary investigations to ensure that its business activities do not infringe on third-party intellectual property rights.
- Your company complies with relevant laws and regulations when obtaining or using third-party intellectual property.
- Your company ensures the protection of intellectual property rights when transferring technology or know-how.
- Your company appropriately protects customer and supplier information.
- Your company systematically provides employee education on respect for intellectual property rights.

#### ( 5 ) Fair Business, Advertising, and Competition

Uphold standards of fair business, advertising, and competition, and prohibit unfair trade and false advertising.

Standards of fair business, advertising, and competition shall be upheld.

Anti-competitive behaviors such as unfair trade restrictions, cartels\*<sup>1</sup>, and bid rigging\*<sup>2</sup> are prohibited by laws in many countries. In addition, unfair competition practices\*<sup>3</sup>— including illegal acquisition or use of other companies' trade secrets, false claims, or

misleading advertising about products or services—are strictly forbidden. Suppliers should recognize the importance of free and fair competition in the marketplace and comply with all relevant laws and standards. In addition, suppliers are required to maintain fair and equitable business relationships with their customers and sales agents.

[Definitions]

\*<sup>1</sup> Cartel:

Refers to acts in which companies in the same industry agree on product prices, sales regions, sales volumes, etc., thereby restricting free competition.

\*<sup>2</sup> Bid Rigging:

Refers to acts in which multiple bidders predetermine the successful bidder or bid price in advance, thereby impeding fair bidding competition.

\*<sup>3</sup> Unfair Competition Practices:

Refers to acts that impede legitimate competition, such as false labeling, improper use of trade secrets, and misleading advertising.

[Checklist]

- Your company has a corporate policy or statement regarding the thorough implementation of fair trading, and promotes its compliance.
- Your company systematically provides employee education on fair trading, such as the prohibition of collusion to avoid competition and price fixing.
- Your company ensures that product information and advertising do not contain false representations and takes care not to mislead consumers.
- Your company has established internal rules and audit systems to prevent unfair competition such as cartels and bid rigging.
- Your company maintains fair and equal relationships in transactions with customers and sales agents.

## ( 6 ) Protection of Identity and Prohibition of Retaliation

Maintain programs to ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers, unless prohibited by law.

Programs that ensure the confidentiality, anonymity, and protection of upstream supplier and employee whistleblowers shall be maintained, unless prohibited by law. Suppliers shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

**[Checklist]**

- Your company has established an internal reporting system (such as a hotline) that allows workers to safely report information regarding discrimination, inhumane treatment, or misconduct.
- Your company has established a clear policy on the protection of whistleblower identity and prohibition of retaliation, and communicates it to employees.
- Your company provides a safe communication environment where workers can raise concerns without fear of retaliation.

**( 7 ) Responsible Sourcing of Minerals**

Establish policies and conduct due diligence to reasonably assure that minerals contained in products are sourced responsibly.

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, cobalt, and mica in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Mineral from Conflict- Affected and High-Risk Areas\* or an equivalent and recognized due diligence framework.

**[Checklist]**

- Your company establishes and publicly discloses a policy on responsible mineral sourcing.
- Your company identifies the origin and supply chain of relevant minerals contained in products and conducts appropriate due diligence.
- Your company has established a procurement management system in accordance with the OECD Guidance or an equivalent recognized standard.
- Your company appropriately assesses risks and implements corrective actions for minerals sourced from conflict-affected and high-risk areas.

\* OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:  
[https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas\\_9789264252479-en.html](https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html)

**( 8 ) Privacy**

Protect the personal information of all stakeholders and appropriately manage it in compliance with relevant laws and regulations.

Suppliers shall commit to protecting the reasonable privacy expectations of personal

information\* of everyone they do business with, including upstream suppliers, customers, consumers, and employees.

Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

[Definitions]

\* Personal Information:

Information about a living individual that can identify a specific individual by name, date of birth, etc., or that can be identified by collating with other information.

[Checklist]

- Your company establishes and communicates company policies and internal rules regarding the handling of personal information to employees.
- Your company complies with laws and regulations related to personal information protection and information security.
- Your company conducts surveys or audits to evaluate whether personal information is being properly managed and protected.
- Your company does not collect private life information from employees or customers that is unrelated to business or transactions.
- Your company obtains clear consent and appropriately manages private life information that is necessary for business purposes.
- Your company does not ask employees or related parties questions regarding political views, religion, or sexual orientation.

## **E. Management Systems**

The Fujifilm Group requests that its suppliers adopt or establish a management system with a scope that is related to the content of the Code.

The management system refers to an overall framework for managing business activities, encompassing organizational structure, planned activities, division of responsibilities, practices, procedures, processes, and management resources. It is important to establish policies related to labor and ethics, occupational safety, environmental conservation, quality control, and other areas; implement measures in accordance with these policies; review them; and maintain the system. Continuous improvement through the PDCA cycle (Plan-Do-Check-Act) is essential.

The management system shall be designed to ensure:

- (a) compliance with applicable laws, regulations and Fujifilm Group's requirements related to the Supplier's operations, products and services.
- (b) conformance with the Code.
- (c) identification and mitigation of operational risks related to the Code, and promotion of continual improvement

There are international standards and guidelines for management systems related to labor and ethics, occupational safety, environmental conservation, quality control, and other areas. Examples of management systems that include mechanisms for risk management, auditing, and improvement of business activities are as follows:

Labor and Ethics (e.g., SA8000), Occupational Safety (e.g., ISO 45001), Environmental Conservation (e.g., ISO 14001, Eco Action 21), Quality Control (e.g., ISO 9001), Information Security (e.g., ISO 27001, ISMS, Privacy Mark)

The management system shall contain the following elements:

### **( 1 ) Company Commitment**

Establish and publicly disclose policy statements on human rights, health and safety, environment, and ethics, clearly demonstrating management's commitment.

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming their commitment to due diligence and continual improvement, endorsed by executive management.

Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

**[Checklist]**

- Your company has established policy statements on human rights, health and safety, environment, and ethics, and has obtained formal approval from executive management.
- Your company makes the policy statements publicly available both internally and externally.
- Your company communicates the policies to workers in a language they understand and through appropriate means.

**( 2 ) Management Accountability and Responsibility**

Clearly identify senior executives and company representatives responsible for the implementation of the management system and related programs.

Suppliers shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs.

Senior management reviews the status of the management systems on a regular basis.

**[Checklist]**

- Your company clearly identifies senior management and company representatives responsible for the implementation of the management system.
- Your company has a mechanism for senior management to regularly review the status of the management system.

**( 3 ) Legal and Customer Requirements**

Establish processes to identify, monitor, and understand applicable legal requirements and customer requirements.

Suppliers shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of the Code.

**[Checklist]**

- Your company has a mechanism to comprehensively identify applicable laws, regulations, and customer requirements.
- Your company continuously monitors changes in laws and customer requirements and has established a system to respond in a timely manner.
- Your company communicates information regarding laws and customer requirements to internal stakeholders and promotes their understanding.



- Your company evaluates and records compliance status, and systematically implements corrective actions and improvement activities.

#### **( 4 ) Risk Assessment and Risk Management**

Systematically identify and assess risks related to business operations, and manage them appropriately based on priority.

Suppliers shall adopt or establish a process to identify relevant risks associated with their operations such as legal compliance, environmental, health and safety, labor practice, information security, and ethics risks.

Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

##### **[Checklist]**

- Your company has a systematic mechanism to identify risks related to legal compliance, environment, health and safety, labor practices, and ethics.
- Your company assesses the relative significance of risks and sets priorities.
- Your company formulates and implements appropriate management procedures for identified risks.
- Your company effectively operates risk reduction measures such as physical controls and continuously improves risk management.

#### **( 5 ) Improvement Objectives**

Set clear performance objectives and implementation plans for continual improvement in social, environmental, and health and safety performance.

Suppliers shall establish written performance objectives, targets and implementation plans to improve their social, environmental, and health and safety performance, including a periodic assessment of their performance in achieving those objectives.

##### **[Checklist]**

- Your company has established written performance objectives and targets for social, environmental, and health and safety areas.
- Your company formulates and documents specific implementation plans to achieve these targets.
- Your company has a mechanism to regularly evaluate the progress and achievement of performance.
- Your company takes improvement actions and reviews the next targets based on evaluation results.

## ( 6 ) Training

Establish and operate training programs for managers and workers to implement policies, procedures, and improvement objectives, and to comply with applicable legal requirements.

Suppliers shall establish programs for training managers and workers to implement their policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

### [Checklist]

- Your company develops and operates training programs to implement policies, procedures, and improvement objectives.
- Your company provides regular training for managers and workers on applicable laws, regulations, and internal rules.
- Your company records and manages the implementation status of training and evaluates its effectiveness.
- Your company ensures that training content is appropriate for the business operations and is updated based on the latest laws and regulations.

## ( 7 ) Communication

Establish processes to communicate clear and accurate information on policies, initiatives, expectations, and performance to workers, suppliers, and customers.

Suppliers shall establish a process for communicating clear and accurate information about their policies, practices, expectations, and performance to workers, upstream suppliers, and customers.

### [Checklist]

- Your company notifies relevant employees of the contents of this Guideline and related policies.
- Your company communicates the significance and importance of this Guideline to suppliers, contractors, and other business partners in the supply chain, and requests their cooperation in sustainable procurement.
- Your company has a process to regularly confirm and evaluate the efforts of suppliers and contractors regarding sustainable procurement.
- The company discloses its sustainability policies, targets, performance, and related information through annual reports, official websites, and other public channels.
- The company has a process to appropriately respond to inquiries and communications from stakeholders across the supply chain, including customers, regarding its sustainability initiatives.

## ( 8 ) Worker/Stakeholder Engagement and Access to Remedy

Establish processes for ongoing two-way communication with workers, their representatives, and other relevant stakeholders, and provide access to remedy.

Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process must be designed to obtain feedback on operational practices and conditions covered by the Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

### [Checklist]

- Your company has a systematic mechanism for two-way communication with workers, their representatives, and other stakeholders.
- Your company provides a safe environment where workers and related parties can freely express grievances and opinions without fear of retaliation.
- Your company continuously improves operational practices and working conditions based on feedback and grievances collected in accordance with the Code.
- Your company ensures that opportunities and means of communication are well communicated to workers and appropriately utilized.

## ( 9 ) Audits and Assessments

Conduct regular self-assessments to ensure compliance with legal requirements, this guideline, and customer requirements.

Suppliers shall conduct periodic self-audits and self-assessments to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

### [Checklist]

- Your company has established a system for regular self-audits and self-assessments covering legal requirements, the content of the Code, and customer contractual requirements.
- Your company formulates and implements corrective actions and improvement plans based on audit results.
- Your company records and manages the implementation status and results of audits and evaluations.
- Your company reports audit results to management, ensuring appropriate decision-making and resource allocation.

### ( 1 0 ) Corrective Action Process

Establish processes to promptly correct deficiencies identified through internal and external evaluations, inspections, investigations, and audits.

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external audits, assessments, grievance reports, inspections, investigations, and reviews, and to strive to implement corrective actions as necessary.

#### [Checklist]

- Your company establishes procedures and processes to identify and correct deficiencies and issues.
- Your company promptly evaluates the results of audits, assessments, and grievance reports, and formulates and implements corrective action plans.
- Your company verifies the effectiveness of corrective actions and takes additional measures or improvements based on the results.
- Your company appropriately manages records related to corrective actions and ensures that relevant personnel have access to them.

### ( 1 1 ) Documentation and Records

Create and retain documents and records to ensure compliance with regulations, internal requirements, and appropriate confidentiality for privacy protection.

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

#### [Checklist]

- Your company establishes and operates document management rules in compliance with applicable laws and internal requirements.
- Your company creates and stores records with the necessary level of confidentiality from the perspective of privacy protection.
- Your company appropriately manages the latest versions of created documents and records, and grants necessary access rights to relevant personnel.
- Your company defines and manages the retention periods and disposal criteria for documents and records.

## ( 1 2 ) Supplier Responsibility

Communicate the requirements of this guideline to upstream suppliers and establish systems to continuously monitor and improve their compliance.

Suppliers shall establish a process to communicate Code requirements to upstream suppliers and to monitor their compliance with the Code as well as their performance.

### [Checklist]

- Your company clearly and promptly communicates the contents and requirements of the Code to upstream suppliers in the supply chain.
- Your company has established a mechanism to regularly confirm the compliance status and performance of upstream suppliers.
- Your company conducts audits and evaluations as necessary to promote the maintenance and improvement of compliance.
- Your company records and manages the results of monitoring and evaluations, and utilizes them for continuous improvement.

### III. Responsible Business Conduct Hotline

The Fujifilm Group receives reports from all stakeholders across the supply chain regarding any suspected violations of human rights.

For external stakeholders, the Fujifilm Group provides a “Contact Us/Regarding Sustainability” form on its official website and also offers channels for reporting through external platforms.

[Contact Point for External Stakeholders]

<https://holdings.fujifilm.com/en/sustainability/activity/other-activities/human-rights#link07>

### IV. Related Policies and Reference Materials

#### [Related Policies]

▶ Fujifilm Group’s Approach to CSR:

<https://holdings.fujifilm.com/en/sustainability/vision/policy>

▶ Fujifilm Group Human Rights Statement:

<https://holdings.fujifilm.com/en/sustainability/vision/policy/statement>

▶ Fujifilm Group Procurement Policy and Approach to Responsible Mineral Sourcing:

<https://holdings.fujifilm.com/en/sustainability/vision/policy/procurement>

▶ Fujifilm Group Charter for Corporate Behavior:

<https://holdings.fujifilm.com/en/about/commitment/conduct>

▶ Fujifilm Group Code of Conduct:

<https://holdings.fujifilm.com/en/about/commitment/law>

*The Charter for Corporate Behavior and Code of Conduct are disclosed in 24 languages.*

<https://holdings.fujifilm.com/en/about/commitment#24languages>

▶ Fujifilm Group Supplier Code of Conduct:

<https://holdings.fujifilm.com/en/sustainability/vision/policy/procurement#link04>

▶ Fujifilm Group “Green Procurement Standards”:

- “Fujifilm Green Procurement Standards” (for suppliers of Fujifilm Corporation and its group companies):

<https://www.fujifilm.com/jp/en/about/sustainability/procurement>

- “Fujifilm Business Innovation Green Procurement Standards” (for suppliers of Fujifilm Business Innovation Corp. and its group companies):

<https://www.fujifilm.com/fb/company/policy/purchase>

#### [Reference Materials]

In preparing this guideline, the following materials were referenced to reflect global social expectations in the terminology, expressions, and criteria for checkpoints.

• RBA(Responsible Business Alliance) Code of Conduct 8.0

<https://www.responsiblebusiness.org/code-of-conduct/>

• JEITA Responsible Business Conduct Guidelines

<https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=788&cateid=1>

• United Nations Universal Declaration of Human Rights

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

• United Nations (UN) Guiding Principles on Business and Human Rights

[https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/A.HRC.17.31\\_en.pdf](https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/A.HRC.17.31_en.pdf)

• OECD Guidelines for Multinational Enterprises:

[https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

- OECD Due Diligence Guidance for Responsible Business Conduct:  
[https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct\\_15f5f4b3-en.html](https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct_15f5f4b3-en.html)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas:  
<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-%20Guidance-Minerals-Edition3.pdf>
- ILO Fundamental Instruments:  
<https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

- o Freedom of Association and Protection of the Right to Organize Convention, 1948 (No.87)
- o Right to Organize and Collective Bargaining Convention, 1949 (No.98)
- o Forced Labour Convention, 1930 (No.29)
- o Abolition of Forced Labour Convention, 1957 (No.105)
- o Minimum Age Convention, 1973 (No.138)
- o Worst Forms of Child Labour Convention, 1999 (No.182)
- o Equal Remuneration Convention, 1999 (No.100)
- o Discrimination (Employment and Occupation) Convention, 1958 (No.111)
- o Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)

#### Revision History

Version	Revision Date	Details of Revision
1st Edition	February 2015	Established the “Fujifilm Group CSR Procurement Guidelines”
2nd Edition	March 2022	<ul style="list-style-type: none"> <li>• Updated to reflect the latest version of the “Fujifilm Group Charter for Corporate Behavior and Code of Conduct”</li> <li>• Changed the title to “Fujifilm Group Sustainable Procurement Guidelines”</li> </ul>
3rd Edition	December 2025	<ul style="list-style-type: none"> <li>• Revised in conjunction with the establishment of the “Fujifilm Group Supplier Code of Conduct”</li> </ul>
3.01 Edition	January 2026	<ul style="list-style-type: none"> <li>• Adjusted table of contents links, formatting, etc.</li> </ul>