

Fujifilm Group

# Supplier Code of Conduct

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## 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.

This Supplier Code of Conduct outlines key practices that Suppliers are expected to implement based on the Fujifilm Group’s principles and policies and with reference to internationally recognized standards such as the RBA(Responsible Business Alliance) Code of Conduct. We ask all Suppliers to understand the purpose of this Code and to conduct their operations in accordance with its provisions. We also request your support in raising awareness and implementation of this Code among your own suppliers.

We sincerely appreciate your continued understanding and cooperation as we pursue sustainable procurement activities together.

December 2025  
FUJIFILM Holdings Corporation

## Definitions and Important Notes

- The term “Suppliers” as used in this Code refers to all entities that manufacture products, parts, software, packaging, and materials, or are involved in related manufacturing processes. This definition also includes subcontractors, such as production subcontractors and providers of indirect services, including security companies.
- To support ongoing improvements in sustainability, the Fujifilm Group may kindly ask Suppliers to respond to self-assessment questionnaires and to accommodate on-site audits. We sincerely appreciate your understanding and cooperation in addressing any findings from these activities.  
While we hope to work together constructively, please be aware that if serious issues are identified and no corrective actions are taken, the Fujifilm Group may need to review the business relationship to ensure alignment with our shared commitment to responsible practices.
- This Code consists of the following five sections.
  - A. LABOR
  - B. HEALTH AND SAFETY
  - C. ENVIRONMENT
  - D. ETHICS
  - E. MANAGEMENT SYSTEMS

## **A. LABOR**

Human rights are fundamental and essential to all individuals. Respect for the inherent dignity of every person engaged in work throughout the supply chain is the foundation of these rights. Without such respect, all personnel supporting companies' growth—whether direct employees, temporary staff, or contracted workers—cannot fully realize their potential, and companies cannot continue to be recognized and valued by society.

The Fujifilm Group respects the human rights of all individuals involved in its supply chain and is committed to providing a safe and healthy working environment, while embracing diverse personalities and individuality.

This commitment applies to all personnel, including those employed directly or indirectly by Suppliers, as well as temporary workers, migrant workers, student interns, contract employees, and others in various forms of employment.

The labor standards are as follows:

### **( 1 ) Prohibition of Forced Labor**

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

All labor shall be voluntary, and necessary measures shall be taken to prevent forced labor.

There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters.

As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment.

Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts.

Suppliers shall maintain documentation on all leaving workers.

Suppliers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits.

Notwithstanding the foregoing, suppliers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents.

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.

## **(2) Young Workers**

Child labor shall not be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations.

Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Suppliers shall provide appropriate support and training to all student workers.

In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.

## **(3) Working Hours**

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 shall be voluntary. Workers shall be allowed at least one day off every seven days.

## **(4) Wages and Benefits**

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.

Suppliers are expected to make efforts to ensure that all workers receive equal pay for equal work and qualifications.

Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

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

Suppliers are expected to prohibit any form of discrimination or harassment and to take responsibility for creating a respectful workplace through their efforts.

There shall be no harsh or inhumane treatment including violence, gender-based violence, behaviors that degrade individual dignity or that disadvantage or threaten individuals based on factors such as gender, authority or position (sexual harassment or power harassment), sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.

Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

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

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.

## **B. HEALTH AND SAFETY**

The Fujifilm Group considers the promotion of occupational safety and health for workers in its supply chain to be a fundamental priority of its corporate activities. As a responsible company, the Fujifilm Group and its Suppliers comply with applicable occupational health and safety laws and regulations, and recognize the importance of safeguarding the physical and mental health of all workers. Efforts are made to maintain and enhance a safe, healthy and comfortable working environment throughout the entire supply chain.

The health and safety standards are as follows:

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

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed. Risks shall be mitigated by applying the Hierarchy of Controls, a systematic approach to workplace risk management that prioritizes preventive measures based on their effectiveness in protecting workers' health and safety. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers work in conditions that could pose health and safety risks to themselves or their child, and providing reasonable accommodations for nursing mothers.

### **(2) Emergency Preparedness**

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

### **(3) Occupational Injury and Illness**

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.

**(4) Industrial Hygiene**

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.

**(5) 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.

**(6) Machine Safeguarding**

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.

**(7) Sanitation, Food, and Housing**

Workers shall be provided with ready 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.

**(8) Health and Safety Communication**

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.



## **c. ENVIRONMENT**

The Fujifilm Group recognizes that addressing environmental challenges is an essential aspect of a corporation's social responsibility and role.

The Fujifilm Group is committed to acting voluntarily and proactively to help solve various environmental issues, including climate change mitigation, promoting a circular economy, biodiversity conservation, ensuring chemical safety, and regional environmental preservation. Furthermore, the Fujifilm Group works collaboratively with other companies throughout our supply chain to achieve these goals.

The environmental standards are as follows:

### **(1) Environmental Permits and Reporting**

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.

### **(2) 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.

### **(3) Hazardous Substances**

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.

### **(4) Solid Waste**

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.

### **(5) Air Emissions**

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.

(\*)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.

**(6) Materials Restrictions**

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.

**(7) Water Management**

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.

**(8) Energy Consumption and Greenhouse Gas Emissions**

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas 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 greenhouse gas emissions shall be tracked, documented, and publicly reported.

## **D. ETHICS**

The Fujifilm Group defines compliance as more than simply not breaking the law: we believe compliance means acting correctly in accordance with common sense and ethics.

In all aspects of business activities within the supply chain, the Fujifilm Group will work together with suppliers to promote initiatives that emphasize compliance and challenge ourselves to create new value.

### **(1) Business Integrity**

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.

### **(2) No Improper Advantage**

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.

### **(3) Disclosure of Information**

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.

### **(4) Intellectual Property**

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.

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

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

### **(6) Protection of Identity and Non-Retaliation**

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.

**(7) Responsible Sourcing of Minerals**

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 Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

**(8) Privacy**

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.

## **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 this Code. 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 this Code; and
- (c) identification and mitigation of operational risks related to this Code. The management system should also facilitate continual improvement.

The management system shall contain the following elements:

### **(1) Company 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.

### **(2) Management Accountability and Responsibility**

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.

### **(3) Legal 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 this Code.

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

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.

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

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.

**(6) Training**

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.

**(7) Communication**

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

**(8) Worker/Stakeholder Engagement and 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 this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

**(9) Audits and Assessments**

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.

**(10) Corrective Action Process**

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.

**(11) Documentation and Records**

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

**(12) Supplier Responsibility**

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.

## 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>

## REFERENCES

This Code was established based on various Fujifilm Group policies (such as the Fujifilm Group Charter for Corporate Behavior and Code of Conduct, Human Rights Statement, Procurement Policy, among others), our initiatives, and widely recognized global standards. The main reference documents are as follows.

- 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/topics/responsible-business-conduct.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)

## Additional Resources

Fujifilm Group has prepared a guideline that provides explanations to facilitate the implementation of this Code, along with checklists for self-assessment.

Please utilize these guidelines to support your ongoing efforts and periodic reviews.

- Fujifilm Group Sustainable Procurement Guidelines for Suppliers  
<https://holdings.fujifilm.com/en/sustainability/vision/policy/procurement#link01>

## Revision History

Version	Revision Date	Details of Revision
1.0	December 2025	Published the “Fujifilm Group Supplier Code of Conduct”