



FUJIFILM Holdings America Corporation

**BUSINESS INTEGRITY AND ENVIRONMENT,  
SOCIAL, GOVERNANCE (ESG) STANDARDS  
FOR BUSINESS PARTNERS**

As a global corporation operating in many diverse and innovative business segments, a core overarching goal is to help enhance the quality of life for people worldwide through our products and services. We will NEVER STOP innovating to create a safer, healthier, and more connected world.

This is no small commitment. Today's issues are large and complex, including the COVID-19 pandemic, the many impacts of a changing climate, global economic and healthcare inequities, pollution, waste and decreasing access to clean water. And tomorrow's challenges may be even greater.

That is why it is imperative that Fujifilm operate in a manner that truly and fully embodies our ethics and values, while incorporating environmental sustainability and corporate social responsibility (CSR) into all our businesses and practices.

Fujifilm's Sustainable Value Plan 2030 (SVP2030), our worldwide CSR Plan, sets forth ambitious goals to be achieved by fiscal year 2030 and serves as our formal commitment to creating a more equitable and sustainable society. SVP2030 follows the framework of the United Nations Sustainable Development Goals (SDGs), and specifically identifies Fujifilm's priority areas as the Environment, Health, Daily Life, Work Style, Supply Chain, and Governance. You can read more about SVP2030 [\*\*here\*\*](#).

However, the greatest goals are rarely achieved alone. We depend on partners like you to help us meet our mission and that begins by embracing a mutual philosophy. Fujifilm conducts business responsibly, transparently, and in compliance with the legal requirements and governmental regulations of the countries in which we operate. We hold our employees, contractors, suppliers and intermediaries to these same exacting standards.

We have codified all of these values and expectations in this document, Business Integrity and ESG Standards for Business Partners. I trust that you will not only adhere to these standards but also internalize them in all your business practices and even seek ways to exceed them where possible.

Let's move forward, side by side, on this most significant of journeys. Together, we can boldly take on society's greatest challenges, with an eye on our shared futures.

Sincerely,

Jun Higuchi

President, FUJIFILM Holdings America Corp.  
President & CEO, FUJIFILM North America Corp.  
Chairman, FUJIFILM Healthcare Americas Corp.



FUJIFILM Holdings America Corporation and its subsidiaries and affiliates are committed to building trust in our business relationships and pursuing the highest standards of ethical corporate behavior. We conduct our business with honesty and integrity, and expect the same from our suppliers, distributors, service providers, licensors and other business partners (Business Partners). Together with our affiliated companies worldwide, we are committed to the ideals of business integrity, social responsibility and environmental sustainability.

We also strive to ensure the well-being of all our workers – not only our employees, but those individuals who work on our behalf as contractors, consultants, temporary associates, agents and representatives. As an international corporation, we understand that our workers worldwide are the backbone of our success, and believe that those workers should feel valued and respected for the jobs they perform. To that end, we also hold our Business Partners responsible for ensuring that their workers are provided working conditions that are in accordance with our philosophy of social responsibility.

Fujifilm supports global sustainable development initiatives in areas such as human rights, business ethics, labor conditions and environmental protection. We also abide by the applicable federal, state, territorial, provincial, local and municipal laws, rules, regulations and directives of all the countries in which we conduct our operations, and we require the same level of compliance from our Business Partners.

We also expect that, like Fujifilm, our Business Partners have a robust program to ensure compliance with applicable laws, as well as a complaint reporting mechanism that will offer anonymity and provide a roadmap for identifying misconduct and resolving complaints.

These Business Integrity and ESG Standards are intended to help all Business Partners more fully understand and comply with Fujifilm's high expectations for legal compliance, ethical behavior, common sense actions, social responsibility and environmental sustainability.

We may require our Business Partners to complete self-assessment questionnaires to ensure they meet Fujifilm's expectations and are fully committed to the important measures set out in these Business Integrity and ESG Standards. For compliance purposes, we also may reserve the right to audit our Business Partners at reasonable times and upon reasonable notice, either through internal means or by using third parties.



# Business Integrity



## Fair Competition

**In all its business dealings, Fujifilm is fully dedicated to the principle that fair competition is essential to a free enterprise system and expects the same of its Business Partners.** Antitrust and competition laws are designed to prevent any business activity that unfairly limits competition and unreasonably restricts fair trade. It is unethical and potentially illegal for Fujifilm or any Business Partner to enter into an agreement with a competitor that unreasonably restricts competition. Fujifilm and our Business Partners shall only seek competitive advantage through lawful means. Failure to comply with all applicable competition laws, rules, regulations and directives would hinder our customers from obtaining Fujifilm products and services at fair prices, and could adversely affect Fujifilm's name and reputation. We require that our employees, contractors and agents, as well as those of our Business Partners, fully comply with all applicable antitrust laws and avoid all appearances of anti-competitive behavior.

*We require our Business Partners to conduct their operations ethically, in accordance with applicable laws and industry standards. Our Business Partners should have adequate systems and controls in place to ensure compliance with these requirements.*

## Conflicts of Interest

**Business Partners must refrain from taking any action that may be influenced by personal interests or relationships.** Business Partners must identify and avoid situations where there is an actual or perceived conflict of interest, not only in their own business dealings but in transactions with Fujifilm workers.

## Anti-Bribery and Anti-Corruption

**Business Partners must have established zero-tolerance policies prohibiting bribery and corruption.** Fujifilm and our Business Partners must not pay, offer to pay, promise to pay, authorize to pay, or accept any bribes or anything of value, or assist Fujifilm or the Business Partner to obtain or retain business or secure an improper advantage in any way, whether in dealings with governments or the private sector. Our Business Partners must not attempt to influence our workers in any way by giving or offering anything of material value or an inducement of any kind that is, or could be construed as, a bribe, including without limitation cash, travel benefits or elaborate entertainment, whether as a gift or otherwise.

In all countries in which it conducts business, Fujifilm complies, and expects each Business Partner to comply, with all applicable anti-bribery, anti-corruption and trade control laws, rules, regulations and directives, including the United States Foreign Corrupt Practices Act, Canada's Corruption of Foreign Public Officials Act, and the United Kingdom Bribery Act. These restrictions preclude making illegal payments through third parties as well. Items of value can include cash payments or other monetary gifts such as gift cards, meals, entertainment, travel-related benefits, or charitable contributions.



## Anti-Money Laundering

**Fujifilm and its Business Partners must conduct business only with legitimate customers and other third parties, paying particular attention to the validity of third-party payment systems.** Money laundering is the process by which people seek to disguise illegally gained proceeds to make the proceeds appear to come from legitimate sources or activities. Money laundering can be used to facilitate crimes such as drug trafficking, terrorism or financial fraud, and can adversely impact the global economy. Fujifilm has measures in place to detect and prevent money-laundering related-activities, and expects that all Business Partners implement the same and fully comply with all applicable laws, rules, regulations and directives prohibiting money-laundering activities.

## Whistleblower Protections

**Sometimes companies must rely on their workers and other concerned individuals to ensure that all applicable laws, rules, regulations and directives are followed. In all such cases, Fujifilm is committed, and requires that its Business Partners commit, to protecting the confidentiality of such whistleblowers to the fullest extent permitted by law.** Retaliation against those who report actual or suspected workplace grievances or other violations of law is prohibited. Fujifilm has a compliance reporting process that protects the confidentiality of whistleblowers, and expects all Business Partners to ensure anonymity of any worker who speaks out against corporate wrongdoing.

Our Business Partners are encouraged to seek guidance from their own internal resources or from Fujifilm if they are uncertain how to act in a given situation. Business Partners that suspect or become aware of an actual violation of applicable laws, rules, regulations or directives in doing business with us must report the matter promptly to us. Information on reporting violations can be found at the end of these Business Integrity and ESG Standards. All Business Partners must cooperate fully with any investigation or audit that arises from a report of corporate wrongdoing.

## Fraud

**As with other forms of misconduct, Fujifilm expects its Business Partners to have appropriate controls in place to prevent any act or intent of cheating, tricking, stealing, deceiving, misrepresenting or lying for any personal or professional advantage.** Fraud is inherently incompatible with our values and our establishment of a corporate culture that is open, fair and clear. Allegations of fraud will be investigated and referred to law enforcement for criminal prosecution when warranted. Our Business Partners must not engage in any fraudulent behavior, including but not limited to:

- Misappropriating funds or property;
- Misusing business resources for private purposes;
- Making or submitting false expense claims;
- Forging invoices or documentation;
- Intentionally filing false financial records or statements;
- Falsifying product or business information or supporting documentation;
- Improper or unauthorized use of Fujifilm trademarks;
- Stealing or misusing intellectual property (including misuse of the Fujifilm name); or
- Stealing or misusing proprietary or confidential business property or intelligence.

## Confidential and Proprietary Information; Insider Trading

**Fujifilm takes seriously its obligations to protect confidential and proprietary information, including sensitive data and trade secrets, and expects the same commitment from its Business Partners.** Fujifilm's internal information security policies and guidelines require that confidential and proprietary information of our Business Partners be protected to the same extent as we would protect our own confidential and proprietary information. This confidential information includes personal data that could be used to specifically identify an individual, as well as protected health information. Fujifilm's Business Partners must not disclose confidential and proprietary information to third parties unless specifically authorized by Fujifilm when there is a legitimate, business-related need to disclose such information and such information is only used for such limited purpose. Our Business Partners' obligations also include respecting and protecting the intellectual property rights of Fujifilm and other third parties, and Business Partners should not take any actions that may infringe the intellectual property rights of others. Each Business Partner also must ensure that non-public information obtained in the course of its business relationship with us is not used for the personal benefit of such Business Partner, its workers or other third parties. All Business Partners must have in place policies restricting the trading or acquisition of shares in any company, public or private, based on material, non-public information. Business Partners must never pass on non-public information or encourage anybody to make a decision on trading or acquiring shares based on such information.

## Data Privacy & Security, and Handling of Critical Information Assets

**Fujifilm has implemented various measures to protect sensitive data, and expects its Business Partners to have in place appropriate security policies and procedures.** Our Business Partners must implement and maintain industry-accepted data security policies and procedures, including incident reporting and disaster recovery protocols, to enable on-going compliance with all applicable laws relating to the protection of personal and business information. All Business Partners are required to protect critical Fujifilm information assets in their possession or under their control, and must strictly limit access to electronic systems that store Fujifilm information assets only as permitted by us. Business Partners must respect the data privacy of others and only collect, transfer, use and retain information in a secure manner and in compliance with law, while disclosing such information only as permitted by law or with the prior written consent of Fujifilm. Business Partners must immediately notify Fujifilm if they become aware of an actual or potential data breach that has or is likely to result in the theft, loss or unauthorized disclosure of confidential and proprietary information of Fujifilm or any third party information that Fujifilm is required to protect.



# Protecting the Safety of our Business Partners' Patients

**Fujifilm expects its Business Partners in the Healthcare and Life Sciences areas to strictly follow all applicable laws, regulations, local ethical codes and lawful industry standards.** Fujifilm, along with our Business Partners, must follow five main principles when conducting business in these areas:

- Treat the health and safety of patients as the first priority in all activities.
- Respect patients and their rights of self-determination, dignity, privacy and human rights.
- Conduct research and developmental activities with the highest level of quality, safety and integrity.
- Provide appropriate and clear information regarding Fujifilm products and services, and keep accurate books and records.
- Ensure appropriateness and transparency in all interactions with healthcare professionals.

When engaged in clinical trials on behalf of Fujifilm, Business Partners must conduct all clinical trials in accordance with the global standards of Good Clinical Practices and applicable local regulatory requirements. All ethical principles must be followed in order to ensure the health and safety of volunteer participants.



## Import and Export Compliance

**Fujifilm is committed to importing, exporting and conducting trade in a compliant and ethical manner, and expects the same commitment from its Business Partners.** Business Partners must comply with all applicable trade regulations, including licensing requirements, sanctions, boycotts, embargoes and other trade restrictions.

## Quality Systems and Change Control

**Fujifilm prides itself on the quality of its products and depends on its Business Partners to honor their commitments.** Business Partners must not make any changes to materials to be provided to Fujifilm, or their specifications or manufacturing or quality processes, without prior approval from Fujifilm. We expect our contractual obligations with our Business Partners to be honored and delivery of products and supplies to be timely. Where required, Business Partners must have quality systems and registration processes in place and remain current with all applicable laws, rules, guidelines and industry codes. Any related requirements between Fujifilm and a Business Partner should be documented in a Quality Agreement. We expect our Business Partners to report any adverse events that relate to Fujifilm products and to ensure packaging is properly and clearly labeled to permit accurate tracking and traceability and to prevent misidentification.

# Documentation and Record Retention

**Fujifilm is committed to data integrity, and requires its Business Partners to protect and preserve information in accordance with all applicable quality rules and regulations.** Business Partners must ensure that documentation or data relevant to activities performed be safe from intentional or unintentional manipulation or loss, including without limitation any documentation relating to current Good Manufacturing Practices (cGMP). Documentation and data provided by Business Partners must comply with all data integrity and record retention requirements set by local or global regulators, as well as those specified in any Quality Agreement with Fujifilm.



## Social Responsibility

*We urge our Business Partners to join us in efforts to ensure that all global workers have the right to safe workplaces where they are treated with dignity and respect, and where diversity is encouraged and celebrated.*

### Labor and Human Rights

**Fujifilm remains committed to the protection of individual dignity and innate human rights and expects the same from its Business Partners.** All Business Partners must know and comply with all applicable laws, rules, regulations and directives regarding employment and human rights. Business Partners must ensure that the following objectives are met within their direct operations and supply chains:

- Employment is voluntary;
- No harassment or discrimination is practiced;
- Child labor and all forced labor, including slave labor, bonded labor or human trafficking, is strictly prohibited;
- No harsh or inhumane treatment is tolerated;
- Each worker's right to freedom of association is preserved;
- Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits;
- Working hours are not to exceed the maximum set by local law. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days; and
- Workplace is safe and measures are taken to promote a healthy work environment, including from airborne infectious disease.

In addition, Business Partners must abide by all laws, rules, regulations and directives that prohibit discrimination against workers on the basis of nationality, age, gender, sexual orientation or gender identity, race, ethnicity, religion, political opinions, ideologies, national or social origin, disability or any other protected category or classification.



# Equal Opportunity and Diversity

**Business Partners must commit to creating and maintaining a fair work environment where all workers are treated with respect.** Fujifilm takes the issue of discrimination very seriously. Business Partners must commit to creating a fair work environment in compliance with all applicable laws concerning discrimination in hiring and employment practices, and to support initiatives such as equal pay for equal work in order to eradicate the effects of inequality in the workplace.

We welcome partnerships with minority-and-women-owned businesses and seek to expand diversity in our business operations. We recognize that promoting diversity among our Business Partners contributes to the economic growth, strength and well-being of communities.



## Worker Health and Safety

**Fujifilm is committed to providing a safe working environment at all its facilities by complying with all laws, rules, regulations and directives applicable to workplace health and safety, and expects a similar commitment from its Business Partners.** Fujifilm expects that our values regarding the protection of workers will be shared by all Business Partners. In this respect, we are fully committed – and expect all our Business Partners to be fully committed – to ensuring the following:

Each worker is provided with appropriate workplace health and safety information and regular training. Health-and-safety-related information must be clearly posted and communicated to all workers. Safety information must address all identified workplace hazards, including mechanical, electrical, chemical, fire and physical hazards. Workers should be encouraged to raise safety concerns.

Identified hazards are eliminated or controlled through proper design, engineering and administrative controls. Workers must be provided with, trained on and required to use, appropriate, well-maintained, personal protective equipment.

Production and other machinery is routinely evaluated, monitored and maintained pursuant to applicable requirements and regulations. Physical guards, interlocks and barriers must be provided and properly maintained if any machinery presents a health and safety hazard to workers.

Occupational injuries and illnesses are managed, tracked and reported pursuant to federal and local requirements.

Procedures are in place for emergency situations, and specially designated workers are trained on response systems, including emergency reporting, evacuation procedures, fire detection and suppression, and first aid.

Reasonable accommodations or adjustments to working arrangements are available to workers who, due to a qualifying disability, are temporarily in need, including time away from the workplace.

Workers are provided with ready access to clean restrooms, potable water and sanitary food preparation, storage and eating facilities. All workspaces and worker housing are to be maintained in a clean and safe condition, with emergency egress, hot water, adequate lighting, heat and ventilation, and reasonable, secure personal space, each as appropriate to such work performed.

# Commitment to the Environment



*Fujifilm and its Business Partners must be committed to operate their businesses in an environmentally responsible and sustainable manner in order to minimize any adverse effects to our planet.*

## Environmental Responsibility

**Fujifilm has a strong commitment to building sustainable businesses that have a minimal environmental impact.**

Fujifilm dedicates itself to environmental responsibility in its products, services and corporate activities and initiatives, and works globally to stay at the forefront of efforts to attain sustainable development by reducing environmental burdens and assuring product safety. We urge our Business Partners to support our environmental policies, such as our philosophy of conservation of resources, which includes effective use of water, and of prevention of pollution, which includes reduction of CO<sub>2</sub> emissions, compliance with regulations, continual improvement in waste reduction, and constant environmental awareness. Support from our Business Partners means supplying viable recycled or reusable goods whenever possible; properly handling, labeling, storing and disposing of all waste while performing services at our facilities; obtaining proper licensing and permits; and supplying only trained, qualified or certified workers for services that pose a threat to the environment. Business Partners are required to comply with all applicable environmental laws, rules, regulations and standards.

We encourage our Business Partners to establish goals in line with those set out in Fujifilm's Sustainable Value Plan 2030, including:

- Addressing climate change;
- Promoting the recycling of resources (including water);
- Addressing energy issues toward a non-carbon society; and
- Ensuring product and chemical safety.



# Responsible Procurement



## Minerals

**Fujifilm participates in international initiatives to address responsible minerals sourcing, and expects its Business Partners to commit to fair trade and social responsibility regarding the mining and procurement of minerals.** Fujifilm recognizes that environmental destruction and human rights violations are serious issues associated with mineral mining and trading. We have no intention of using minerals whose mining and trading operations are funding sources for armed conflicts, or that result in harm to individuals or local communities. We follow international guidelines to ensure responsible procurement across our supply chain, and use tools defined by mining oversight organizations to investigate the history of minerals contained in our products. We also require that our suppliers procure minerals from refineries that receive conflict-free certification from leading industry groups. We require that our Business Partners fully comply with these and similar initiatives in this area and to make available supply chain data so that we can ensure transparency.

For minerals produced in conflict affected and high risk areas (CAHRAs), the Fujifilm Group observes the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" to ensure responsible procurement across our supply chain. We also use mechanisms and tools defined by the Responsible Minerals Initiative (RMI), a global supply chain resource, to investigate the history of minerals contained in our products.

In response to customer requests on conflict minerals, reporting of which is obligated by laws and regulations, we provide the results of mineral history investigation using the RMI. We require that our suppliers procure minerals from refineries that have received conflict-free certification from the RMI and other industry organizations.

## Product Lifecycles and a Greener World

**Fujifilm is working hard to reduce its environmental impact through the lifecycle of its products, and we encourage our Business Partners to work with us to accomplish these goals.** Fujifilm's efforts to reduce our global footprint include better management of products that contain chemical substances, while encouraging the reuse and recycling of resources across our companies. These efforts are not simply a matter of compliance with environmental regulations, but are also an attempt to set our own high standards for the entire lifecycle of our products, from procurement of resources and components to the manufacture, sale, use and disposal of the end product. Fujifilm's Green Procurement Standards can be found here: [https://www.fujifilm.com/about/procurement/fujifilm\\_green\\_procurement\\_standards/](https://www.fujifilm.com/about/procurement/fujifilm_green_procurement_standards/).

Conducting business with Fujifilm will indicate your acceptance of these Business Integrity and ESG Standards. However, we also do reserve the right to perform audits at reasonable times and upon reasonable notice to ensure that our Business Partners continue to uphold the values outlined in these standards. Failure to comply with these Business Integrity and ESG Standards may result in discontinuance of our business relationships with you, with immediate termination rights.

Fujifilm expects immediate notification from its Business Partners regarding any known or suspected violation of these Business Integrity and ESG Standards. You can notify us through your Fujifilm business representative or through our dedicated reporting channels. In the U.S. and Canada, you can contact our Compliance Hotline at 1-844-876-1181 or online at [www.fujifilmcompliancehotline.com](http://www.fujifilmcompliancehotline.com). In Central and South America, the Compliance Hotline numbers are as follows: Mexico: 01-800-681-1867, Brazil: 0-800-892-2297, and Colombia: 01800-518-5303. In the United Kingdom and Europe, notification can be made through the Fujifilm Europe Whistleblowing System at <https://www.bkms-system.com/fujifilm>. By submitting information through the Fujifilm Europe Whistleblowing System, your personal data will be handled in line with the Whistleblowing System privacy policy, available at the link above, which policy also addresses any transfer of your personal data outside the European Union.



# FUJIFILM

**Value from Innovation**

INNOVATION THROUGH **INTEGRITY**

AN OPEN, FAIR AND CLEAR CORPORATE CULTURE IS THE BASIS FOR ALL OUR ACTIVITIES.