

2.2.7 Corruption (Bribery) Prevention Efforts

To nurture a corporate culture based on the open, fair, and clear spirit, as stated in the Group Vision, Chapter 2 (Fair Corporate Activities) of the Fujifilm Group Charter for Corporate Behavior and Code of Conduct clearly declares the requirement for Fair Sales Activities, Fair Procurement, Prevention of Corruption, and Prohibition of Bribery and restriction on gift-exchange and Entertainment. The chapter states that we must avoid any actions that could cause suspicion of a collusive relationship with a third party or could jeopardize the fair relationship with suppliers; we should avoid being involved in any corrupt activities; and we also should avoid any dubious action that could cause suspicion of fraud with retailers, business partners, public officials and government representatives. In response to the increasing reinforcement of corruption prevention laws across the world, each Group company implements anti-bribery rules. We also conduct regular onsite audits in areas where the risk is deemed to be high.

The Fujifilm Group never had a corruption or bribery, and we have never been investigated by administrative authorities concerning any anti-corruption matters.

Anti-corruption effort  URL: <https://www.fujifilm.co.jp/corporate/environment/compliance/anti-corruption/index.html>

2.2.8 Anti-competitive Practice Prevention Efforts

The Fujifilm Group is working hard to observe anti-trust laws, maintains a regular education system, and holds annual self audits. Since 2003, we have never been subject to a penalty concerning antitrust/anticompetitive practice nor are there any ongoing antitrust lawsuits.

2.2.9 Export and Import Control

The Fujifilm has created the Global Security Trade Control Policy, one of the basic policies commonly shared across the Fujifilm Group, and control our exports based on this policy. This is our means of preventing products and goods that could be converted into arms or be adapted for military use from being obtained by terrorists or nations that could threaten international security. We can therefore state that we contribute to maintaining international safety not only by observing the related laws.

The Fujifilm Group never had a case pointed out by administrative authorities concerning export and import control.

Global Security Trade Control Policy  URL: <https://www.fujifilmholdings.com/en/sustainability/vision/control.html>

2.2.10 Whistle-Blowing Office and Consultation Office

The Fujifilm Group has a separate whistle-blowing system. One is in Fujifilm Holdings that can be accessed directly by all Fujifilm Group employees across the world (consultation available in Japanese, English and other 23 languages), and the other enables employees to report to each regional headquarter. Both can be accessed anonymously, and protection of the whistle-blower is stipulated to protect them from detrimental treatment caused by reporting.

- Number of whistle blowing reports in the Fujifilm Group in FY2018: 298 (199 in Japan and 99 in overseas)

Seventy percent of the report contents were harassment, human relationship issues, and HR or labor matters; however, no serious issues were identified.