

2.2.5 Compliance Education

Contents of Compliance Education

Intended audience	Details	Participants (FY2018 results, Unit: person)								
		Fujifilm Group			Fuji Xerox Group			Fujifilm Holdings Total		
		Domestic	Overseas	Total	Domestic	Overseas	Total	Domestic	Overseas	Total
All employees (Executive officers, managers of divisions, general employees)	Overall compliance	-	12,660	12,660	-	-	0	-	12,660	12,660
	Compliance declaration for code of conduct	-	-	0	24,273	21,654	45,927	24,273	21,654	45,927
	Information security, e-learning	21,934	-	21,934	26,412	-	26,412	48,346	-	48,346
New employees (New executive officers, new managerial personnel, new general employees)	Overall compliance and risk management	473	-	473	752	-	752	1,225	-	1,225
Group companies (domestic priority companies) Employees (Executive officers, general employees (including contract/temporary employees))	Harassment prevention	3,780	-	3,780	-	-	0	3,780	-	3,780
Risk managers	General risk management	-	84	84	-	-	0	-	84	84
	Enhancement for harassment cases	67	-	67	-	-	0	67	-	67
Sales companies (Presidents and managerial personnel)	Training of compliance case study	-	-	0	-	62	62	-	62	62
Total		26,254	12,744	38,998	51,437	21,716	73,153	77,691	34,460	112,151

2.2.6 Compliance Awareness Survey

Conducting a follow-up survey to the FY2017 Compliance Awareness Survey

We conducted a Compliance Awareness Survey of all our Group employees (93,000 employees across 320 organizations) in December 2017. In September 2018, we undertook a follow-up survey targeting the organizations where a large number of respondents answered that they know about a compliance violation (27,000 employees across 23 organizations) to identify the concrete facts in these cases. As a result, actual compliance violations identified were as low as 4% of reported case and there were no serious problems that could affect our business. The concrete issues we discovered in the survey were further investigated within each organization to prevent any recurrence.

Conducting Harassment Awareness Survey in “critical” workplaces in the Fujifilm Group

The Harassment Awareness Survey undertaken in December 2016 of all Fujifilm Group employees in Japan (21,000 employees in 36 companies) found out that seven companies had higher percentages of employees answering that they had experienced harassment than the Group mean figure. We conducted the same awareness survey in June 2018 on those seven companies and two additional companies that newly joined the Group. The additional survey identified an improvement in only one company but the remaining eight companies were still below the mean figure. Since September 2018, we have been providing a harassment prevention program and workplace discussions in each company to prevent any further cases of harassment.

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.