

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE MANAGING DIRECTOR OF FUJIFILM GERMANY GMBH

FUJIFILM Germany GmbH is a distributor of digital cameras, optical devices and accessories throughout Europe.

We are a part of the group of companies owned by FUJIFILM Holdings Corporation which has its head office in Japan (“**Fujifilm Group**”).

As a global organisation providing customers with innovative product and service solutions around the world, the Fujifilm Group is involved in the procurement of numerous materials, components and services. In this role the Fujifilm Group acknowledges that it is responsible for ensuring the quality and safety of its product and service solutions and appropriately managing the supply chain of materials, components and services used in their production. The Fujifilm Group is also a significant user of services within its organisation at both a global and local level. In response to ever increasing social demands, the Fujifilm Group is keen to fulfil its social responsibilities across its entire supply chain. The scope of this responsibility covers the global environment, ethics, human rights, health and safety and other labour conditions of those working within the supply chain from a corporate social responsibility perspective. FUJIFILM Holdings Corporation has signed up to United Nations Global Compact, a voluntary initiative that encourages companies to undertake fair operations in the area of human rights, labour, environment and anti-corruption.

Under a partnership with its suppliers based on mutual understanding and trust, the Fujifilm Group aims to build a more robust and sustainable supply chain through socially responsible procurement that reduces business risks in the supply chain and increases the competitiveness and corporate value of all parties in the chain. As part of these activities, the Fujifilm Group continues to improve its practices to combat any kind of slavery and human trafficking. Companies within the Fujifilm Group are required to conduct their activities in accordance with the [Fujifilm Group Charter for Corporate Behaviour](#) and the [Fujifilm Group Code of Conduct](#) which cover a variety of ethical business principles including the prevention of slavery and human trafficking in the activities of such companies. For those of our companies involved in the healthcare sector, the [Fujifilm Group Global Healthcare Code of Conduct](#) must also be complied with.

The [Fujifilm Group Human Rights Statement](#) applies to all personnel in the Fujifilm Group. All business partners associated with the provision of any products and/or services of any Fujifilm Group company are also expected to comply with this Statement. This is driven by a belief that respecting the human rights of workers in the supply chain increases productivity and moral action, which in turn leads to the provision of better products and services, as well encouraging innovation. In addition, the [Fujifilm Group AI Policy](#) establishes basic principles for the application of AI technology, such as respect for human rights and fair and appropriate use of the technology, for our various businesses to guide the drive to accelerate the use of technology to resolve social issues. This was updated in December 2025 to align with the new Fujifilm Group Purpose of “Giving Our World More Smiles” and to strengthen the Fujifilm Group’s commitment to the responsible use of AI technology.

The Fujifilm Group aims to develop together with its suppliers by encouraging them to take initiatives in CSR activities to spread such positive effects. Recognizing the slavery and human trafficking impact of the conflict minerals issue, the [Fujifilm Group's stance toward the issue of responsible minerals](#)

[procurement](#) is also made clear in more detail on the Fujifilm global website and Fujifilm Group companies are obliged to undertake the required actions in this area.

As part of the Fujifilm Group's commitment to these principles, FUJIFILM Holdings Corporation adopted the [Fujifilm Group Supplier Code of Conduct](#) ("**Supplier Code of Conduct**") in December 2025 which outlines key practices that suppliers are expected to implement based on the [Fujifilm Group Charter for Corporate Behaviour](#), [Fujifilm Group Code of Conduct](#) and [Fujifilm Group Human Rights Statement](#) along with the Fujifilm Group's other principles and policies and is based on internationally recognized standards. This continues the development of its Sustainable Procurement Promotion Program that also covers (1) dissemination of procurement-related policies (including the [Fujifilm Group Sustainable Procurement Guidelines for Suppliers](#) ("**Supplier Guidelines**") which was updated in January 2026 to align with the [Supplier Code of Conduct](#); (2) risk assessments of suppliers in high risk areas; and (3) requests to improve any supplier facing CSR risks together with offers of support. The program is run cyclically to check on suppliers to ensure improvements have been made. This Sustainable Procurement Promotion Program has been adopted by Fujifilm Group companies in Japan (including FUJIFILM Corporation (a Japanese subsidiary of FUJIFILM Holdings Corporation which owns the group of subsidiary companies to which we belong)) and certain Fujifilm Group companies in other parts of Asia, in Europe and in North America. This Sustainable Procurement Promotion Program will continue to be introduced at other Fujifilm Group companies around the world.

In addition, FUJIFILM Holdings Corporation's stated goal under its Sustainable Value Plan 2030 (SVP 2030), is to become a corporation that promotes social innovation involving all employees and action on social issues from a long-term perspective. In connection with the 15 priority issues established in the six areas of the environment, health, daily life, work style, supply chain and governance, enhancing management of the entire supply chain from the viewpoint of Corporate Social Responsibility has been established as one of the particular priority areas.

ORGANISATION STRUCTURE

Beginning in 1934 as Japan's pioneering photographic film maker, the Fujifilm Group has leveraged its imaging and information technology to become a global presence known for innovation in healthcare, graphic arts, optical devices, highly functional materials and other high-tech areas. The Fujifilm Group has over 73,500 employees worldwide and operates in most countries around the world. The Fujifilm Group has a global annual turnover of over £15.8 billion.

OUR BUSINESS

FUJIFILM Germany GmbH is incorporated in Germany. Here, FUJIFILM Germany GmbH acts as European distributor of **FUJIFILM** branded digital cameras and accessories and **FUJIFILM** and **FUJINON** optical devices and accessories and **FUJIFILM** Recording media products sourced from FUJIFILM Corporation, directly to retailers and wholesalers in Germany, the Netherlands, Austria, France, Belgium, the UK and Ireland. Also, the company operates e-commerce web-shop to end-users in Germany, France, the UK, Italy, Spain and Portugal. The Company also manages stock on a central basis from Düren and distributes to other Fujifilm subsidiaries across Europe. Lastly, the Company sells to a number of third-party distributors in smaller countries, who represent FUJIFILM Germany GmbH and sell to their local retailers. In addition, FUJIFILM Germany GmbH operates an individual country branch in the Netherlands, which supports the Dutch market.

OUR SUPPLY CHAINS

We source almost all of our products from FUJIFILM Corporation in Japan. A small quantity of accessories is purchased locally, along with marketing materials and other assets which support the running of the business in Germany and Netherlands. These, along with the services we procure, are almost exclusively sourced from local suppliers based in the European markets in which we operate.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We comply with the [Fujifilm Group Charter for Corporate Behaviour](#), [Fujifilm Group Code of Conduct](#), and [Fujifilm Group Human Rights Statement](#) which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and promoting this approach in our supply chains via the [Supplier Code of Conduct](#) and the [Supplier Guidelines](#) to prevent and mitigate any human rights abuses.

As a number of the products we sell are ultimately sourced from FUJIFILM Corporation, this is also reflected in their adoption of the Sustainable Procurement Promotion Program as referred to above.

OUR PROCESSES TO PREVENT SLAVERY AND HUMAN TRAFFICKING

All Fujifilm Group staff around the world are required to abide by the [Fujifilm Group Charter for Corporate Behaviour](#), [Fujifilm Group Code of Conduct](#), and [Fujifilm Group Human Rights Statement](#) in order to ensure that all Fujifilm Group companies exhibit and promote ethical business activities.

FUJIFILM Holdings Corporation conducts annual screening of priority risk issues (including potential ones) in business processes at all Fujifilm Group companies. All Fujifilm Group companies identify priority risk issues, plan and execute necessary measures to address those issues, and manage their results. Priority issues for the Fujifilm Group as a whole, based on the review results for each Fujifilm Group company, and the results of action implemented are reported to, and deliberated on by, the FUJIFILM Holdings Corporation ESG Committee and reported to the Board of Directors of FUJIFILM Holdings Corporation. This includes human rights issues. Human rights are specified explicitly as one of the perspectives requiring attention at each Fujifilm Group company in review of our priority risk issues. If a Fujifilm Group company has identified any human rights risk, it is required to develop and implement preventive and mitigating measures. FUJIFILM Holdings Corporation uses external risk screening services for vetting suppliers for potential unethical business activities to enable early initial responses. This service covers nearly 3,000 suppliers in China, Japan and other Asian countries, from which we source about 70% of our direct materials in terms of procurement amount.

The Fujifilm Group is a member of the [Japan Center for Engagement and Remedy on Business and Human Rights \(JaCER\)](#) which provides a non-judicial “Engagement and Remedy Platform” in relation to potential human rights issues that complies with the United Nations’ Guiding Principles on Business and Human Rights. In the reporting year, basic training on "Business and Human Rights" was completed by 99.2% of all executives and employees in Japan (49,273 individuals) and by over 8,500 targeted employees in China (98.6% of those targeted). During the training, awareness of the use of membership of the JaCER to enhance the objectivity and fairness of its grievance (whistleblowing) mechanisms in its supply chain in the area of human rights was highlighted, as well as the importance of Fujifilm’s ethical procurement goals.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from certain Fujifilm Group companies in other parts of Asia, Europe and North America (if any), procurement staff in those companies are expected to operate the Sustainable Procurement Promotion Program in order to seek to establish that suppliers act in accordance with the [Supplier Code of Conduct](#) and the [Supplier Guidelines](#).

As part of the initiatives in Fujifilm Europe generally to identify and manage risk, for the products that we source from elsewhere and for services, our procurement staff work to mitigate the risk of slavery and human trafficking occurring in our supply chains in accordance with the [Fujifilm Group Charter for Corporate Behaviour](#) and the [Fujifilm Group Code of Conduct](#). As part of our supplier and business partner due diligence processes, we apply risk-based screening and monitoring measures to identify potential human rights and compliance risks. Suppliers are expected to adhere to the Fujifilm Europe Supplier Code of Conduct, and concerns can be reported through established whistleblowing channels that support confidential reporting and protection against retaliation.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

The Fujifilm Group promotes actions to ban slavery and human trafficking from its supply chain mainly with the framework of ethical procurement.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation or from Fujifilm Group companies in certain other parts of Asia and in North America (if any), suppliers of those products are requested to commit to ethical business principles in a number of areas where human rights can be affected - these include the prohibition of forced labour, child labour and inhumane treatment (including in the context of conflict minerals) as set out in the [Supplier Code of Conduct](#) and the [Supplier Guidelines](#). The [Supplier Code of Conduct](#) was communicated to priority suppliers in Japan, China and other Asian regions. During the reporting year, forms agreeing to adhere to the [Supplier Code of Conduct](#) were received from 1,519 suppliers.

More and more Fujifilm Group companies also use the Fujifilm Group Supplier CSR Checklist to assess suppliers' compliance with the [Supplier Code of Conduct](#) and the [Supplier Guidelines](#) where considered necessary. As a result of suppliers completing these Checklists, primary suppliers in Japan, Europe and the USA have been assessed as a low CSR risk. These Fujifilm Group companies continue to extend the request to complete these Checklists to direct suppliers around the world (Tier 1 suppliers) and increasingly to manufacturers supplying those suppliers (Tier 2 suppliers). In the reporting year Fujifilm Group companies received approximately 900 completed Checklists from suppliers covering over 1,500 sites. Fujifilm Group companies also have provided feedback sheets to each supplier after receipt of a completed Checklist which includes scores and comments on where improvements (if any) are necessary, including on human rights-related items. In cases where significant risk is identified, Fujifilm Group companies continue to conduct on-site CSR audits using expert teams from Fujifilm Group company production sites. Again, China and Vietnam were the main countries where issues arose with further risk assessment being required on 50 suppliers which resulted in carrying out on-site audits of 46 suppliers out of those 50. In addition to the on-site audits, interviews and other follow-up engagements were conducted with 198 suppliers where responses to the Checklist were deemed worthy of more detailed investigation. As a result of all these activities, improvements have been confirmed with suppliers in areas such as better management of overtime hours/prevention of continuous work shifts, improved labour/human rights management systems in relation to, amongst other things,

discrimination and the health and safety of young workers, better management of chemicals and toxic substances and ensuring that suppliers have in place internal whistleblowing systems.

Chinese suppliers remain a key focus area and strengthening engagement with suppliers is seen as critical. As mentioned last year the appointment of a local co-ordinator in China, in addition to providing improvement requests and advice in Chinese, has enhanced supplier engagement (responding to inquiries, providing specific advice, and conducting briefing sessions for suppliers), as well as strengthening CSR efforts at all Fujifilm Group's manufacturing sites in China (with training programs for buyers being conducted in October 2025 and March 2026). A Sustainable Procurement Briefing Session (including communication of the [Supplier Code of Conduct](#) and broader sustainable procurement expectations) for suppliers to all Fujifilm companies in China was held in December 2025, Fujifilm Group's first-ever event covering suppliers to all of its Chinese manufacturing sites.

For the products that we source ourselves and for services, our activities consist of working with our suppliers to understand their approach to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

In addition, we operate a compliance due diligence process for business partners, including the screening of high-risk business partners for risks related to the involvement in non-compliant activities and also including information about the involvement in human rights violations.

TRAINING

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we work with our procurement staff to ensure they act ethically and with integrity in their interactions with our suppliers and to implement and promote this approach in our supply chains.

FURTHER STEPS

To combat human rights risks within the supply chain, Fujifilm Group companies will continue to promote actions with the framework of ethical procurement. The roll-out of the [Supplier Code of Conduct](#) to suppliers has continued and will continue together with ongoing supplier engagement and capability-building initiatives, continued procurement and human-rights training programmes and supplier assessment, follow-up engagement and audit programmes.

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Continue with the implementation of Supplier Guidelines ([Fujifilm Europe Supplier Code of Conduct](#)) into our own procurement activities
- Continue to monitor our suppliers in the perceived higher risk sectors to increase sensitivity for compliant activities in this area

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for FUJIFILM Germany GmbH for the financial year ending 31 March 2026.



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Shinichiro Udon
Managing Director
FUJIFILM Germany GmbH

Date: 16/09/2026

This statement was approved by the Board of Directors of FUJIFILM Germany GmbH on
18 September 2026.