MODERN SLAVERY AND HUMAN TRAFFICKING

INTRODUCTION FROM DAVID ALWOOD, PRESIDENT

FUJIFILM WAKO CHEMICALS U.S.A. CORPORATION

FUJIFILM Wako Chemicals U.S.A. Corporation (FUJIFILM Wako) is a wholly owned subsidiary of FUJIFILM Wako Pure Chemicals Corporation of Japan and worldly renowned for its high purity chemicals. Wako supplies high quality, high purity reagents for research, water-soluble azo inhibitors, and tests for gram negative bacteria in injectable materials.

We are part of the group of companies owned by FUJIFILM Corporation ("FUJIFILM Group"), with head offices in Japan.

The FUJIFILM Group is dedicated to developing mutually beneficial partnership relationships with suppliers. Through our procurement policies and procedures, the FUJIFILM Group fosters social and environmental responsibility, while encouraging fair trade and free enterprise in international markets.

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. As part of the FUJIFILM Group's commitment to these principles, in June 2015 FUJIFILM Corporation adopted the FUJIFILM Corporate Social Responsibility Procurement Guidelines for suppliers ("Supplier Guidelines") under which suppliers to FUJIFILM Corporation 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 labor, child labor and inhumane treatment.

In August 2017 FUJIFILM Holdings Corporation announced the adoption of its Sustainable Value Plan 2030 (SVP 2030) in which its stated goal is to become a corporation that promotes social revolution through innovation involving all employees and action on social issues from a long-term perspective. In connection with the 15 priority issues established in the four areas of the environment, health, daily life and work style, enhancing management of the entire supply chain from the viewpoint of Corporate Social Responsibility has been established as a particular priority area.

ORGANISATION STRUCTURE

FUJIFILM Wako employs over 90 employees. The company is headquartered in Richmond, VA for production, sales and marketing, with a laboratory facility in Cape Charles, VA, and a marketing office in Boston, MA.

OUR BUSINESS

FUJIFILM Wako sells and supports its products worldwide through direct sales and to distributors from its office in the United States.
OUR SUPPLY CHAINS

Our supply chains includes products and services sourced from both the Unite States and foreign suppliers. Our foreign suppliers are located in Europe, China, Mexico, Russia, and Japan. Many of these products are provided by our Japanese parent company.

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 and FUJIFILM Group Code of Conduct 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.

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 and FUJIFILM Group Code of Conduct in order to ensure that all FUJIFILM Group companies exhibit and promote ethical business activities. FUJIFILM Group companies are required to complete an annual checklist which requires them to answer questions on their measures to prevent forced and child labor.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation, procurement staff in those companies are expected to identify and assess potential risk areas in the supply chain and work with suppliers in those areas in order to seek to establish that those suppliers act in accordance with the Supplier Guidelines.

As part of our own initiatives to identify and manage risk for products that we source ourselves and for services, our procurement staff work to mitigate the risk of slavery and human trafficking occurring in our supply chains.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We promote action to ban slavery and human trafficking from our supply chain.

For the products that we sell that are ultimately sourced from FUJIFILM Corporation, suppliers of those products are requested to commit to the ethical business principles set out in the Supplier Guidelines. Further, those FUJIFILM companies aim to reflect those standards in cooperation agreements with suppliers and business partners. The Fujiﬁlm Supplier CSR Checklist that is used to assess compliance with the Supplier Guidelines is based on the CSR standards issued by the United Nations Global Compact and the Responsible Business Alliance (RBA) and is revised in response to changes in legal regulations and social demands.

For products that we source ourselves and for services, our activities consist of assessing supplier risk, conducting periodic re-evaluation of supplier risks, and continually monitoring suppliers through such means as on-site audits, business reviews and supplier surveys. Suppliers are evaluated and selected based on their ability to supply components, services, or products that meet FUJIFILM Wako Chemicals requirements.

FUJIFILM Wako Chemicals is committed to ethical behavior. We adhere to our internal Standards of Business Conduct and Compliance Standards which outlines the legal and ethical standards each
employee has a personal obligation to uphold with each other, customers, vendors and the general public. Employees must operate as good corporate citizens, and comply with all federal, state and local laws and regulations applicable to their respective businesses, including: requiring those with whom we do business to conduct themselves in accordance with applicable laws and regulations; remaining alert and sensitive to situations that could result in any fraudulent, illegal, unethical, improper actions by any employee, agent or representative; and upholding the principles and practices of equal employment opportunity, non-discrimination and workforce diversity.

As part of the FUJIFILM Group, we also share in the Corporate Social Responsibility (CSR) commitment to contribute to the sustainable development of society by putting into practice the FUJIFILM Group’s Corporate Philosophy and realizing its vision through sincere and fair business activities. The CSR Promotion system consists of a committee at the highest level to ensure that the systems are implemented and adhered to. The following systems under the CSR program are used for compliance with supply chain transparency laws and regulations:

- FUJIFILM Group Charter for Corporate Behavior
- FUJIFILM Procurement Policy
- FUJIFILM Standards of Business Conduct and Compliance with Law Program (US)

**TRAINING**

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to 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 chain.

**FURTHER STEPS**

At a FUJIFILM Group level, FUJIFILM Holdings Corporation published its Human Rights Statement in June 2018. This applies to all personnel in the FUJIFILM Group and all business partners associated with the provision of any products and services of any FUJIFILM Group company are also expected to comply with the Statement. Its publication bolsters awareness of the importance of human rights issues within the FUJIFILM Group through internal and external communication and further dissemination of the Statement. At the same time, FUJIFILM Group companies are encouraged to cooperate with its partners and suppliers in conducting a more comprehensive assessment of the impact of potential human rights risks in each business field and to strengthen prevention and mitigation measures.

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to adopt and support all corporate policies related to business ethics and respect for human rights, and to periodically review our policies and procedures to help maintain compliance with internal policy and external laws.

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 Wako Chemicals U.S.A. Corporation, for the financial year ending 31 March 2018.

Date: July 1, 2019

President
FUJIFILM Wako Chemicals U.S.A. Corporation