

## **FUJIFILM Imaging Colorants Limited**

### **Corporate Policy Anti-Corruption**

Version 1.0

June 2015

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April 2, 2012

Re: Anticorruption compliance policy

President and CEO of FUJIFILM Corporation  
Shigetaka Komori

Fujifilm Group has declared and adopted the following group vision:

“Anchored by an open, fair and clear corporate culture and with leading-edge, proprietary technologies, Fujifilm is determined to remain a leading company by boldly taking up the challenge of developing new products and creating new value.”

We have fully committed to this group vision by operating at all times in a manner that complies with all applicable laws and international rules and regulations. As such, our fair business performance has received a very favorable reputation worldwide.

Over the past years, we have seen an increase in the number of incidents where globally renowned companies and their directors, officers and employees are prosecuted and heavily penalized because of their corrupt conduct in relation to their business in emerging countries. Authorities within the U.S. and the U.K., in particular, have become heavily focused on enforcement of their respective anticorruption regulations (\*). While Fujifilm Group has always emphasized compliance in all aspects of our corporate activities, in furtherance of our effort to expand business with particular focus on emerging countries, we hereby once again make clear our position to eliminate corruption and to commit ourselves to the highest degree of ethics in compliance with laws, rules and regulations.

\* Under the U.S. Foreign Corrupt Practices Act, employees and corporations have become subject to imprisonment and/or substantial fines when found responsible for unlawful payments to foreign officials; the number of such penalties has rapidly increased in recent years, especially with respect to corporate activities in developing countries. In addition, the recent introduction of the UK Bribery Act and its vigorous enforcement highlights the increased global scrutiny on corrupt practices.

As stated in “Fujifilm Group Compliance Statement,” it is the highest priority for anyone who engages in corporate activities for Fujifilm Group to comply with laws, rules and regulations and to pursue fairness in the conduct of business operation. This code of conduct for compliance is second to nothing. Any conduct in violation of this code of conduct is never permitted for any reason. This is not only a manifest rule but at the same time our pledge to all of our stakeholders.

Today, we are introducing a new anticorruption compliance policy. Directors, officers and employees of Fujifilm Group must be in full compliance with the policy and exert continuous efforts through fair operation of business in order to realize our group vision.



**Shigetaka Komori**

## 1. Objectives

Our Company is committed to the highest degree of ethics in compliance with laws, rules and regulations. We firmly believe that sustainable success in business is only possible based on free, fair and transparent competition. Fujifilm relies on transparency, performance, customer orientation, and quality of its products and services, not on illegal or unethical practices, to succeed.

By its very nature corruption violates the above principles. Fujifilm firmly believes that corruption is both a serious cause of poverty and injustice in the world and a barrier to overcoming it. Therefore, **we take a zero-tolerance approach to corruption or bribery**, not only as a clear and unambiguous rule but also as a commitment to all of our stakeholders.

**Bribing** public officials, or employees or representatives of prospective or current business partners (customers, suppliers, etc.) as well as soliciting **or accepting bribes, is illegal**. Fujifilm is committed to upholding all laws relevant to countering bribery and corruption. In particular we, as a UK company, are bound by the Bribery Act 2010 in respect of our conduct both at home and abroad, irrespective of local customs. **Anticorruption laws also prohibit indirect forms of corruption** used for the purposes of disguising corrupt activities. Examples are money payments or other benefits to relatives or friends of the intended recipient or bribes covered as “fees” for services that have in fact little or no value as well as unlawful discounts or bonuses, equity participations, overpricing etc.. **It is not possible to circumvent anticorruption laws by hiding under a merely superficially legal transaction.**

You should be aware that:

- Bribery and corruption, wherever committed, are serious offences and are not acceptable.
- Persons involved in corrupt practices may be severely punished.
- Corrupt practices – or even the suspicion of corrupt activities - may cause serious harm to the Fujifilm group.
- Authorities are dedicating high and internationally coordinated attention to the investigation of corruption. The risk of detection and punishment are high.

This policy is based on Fujifilm’s ethical belief as reflected in its Group Charter for Corporate Behavior and its Code of Conduct. It is supplemented by respective training material which can be obtained directly from the European Legal Department or on its intranet website.

Fujifilm’s main objective is to **prevent** any officer and/or employee of our Company, and any individual or corporate entity performing services for or in the name of our Company, from directly or indirectly **giving or receiving bribes of any kind**. **Fujifilm will take appropriate and severe action against those violating these obligations.**

## 2. Scope

This Policy is based on the Corporate Policy Anti-Corruption applying to all FUJIFILM Europe companies (“**FF Europe Corporate Policy Anti-Corruption**”). It has been adjusted for use in the UK/Ireland and applies to all Personnel of FUJIFILM Imaging Colorants Limited.

### 3. Corruption and Bribery – Prohibited Conduct

#### 3.1 Corruption

Corruption is an **abuse by a person of their position of trust in order to obtain an undue advantage for themselves or a third person**. Corruptive practices frequently result in severe criminal offences like bribery, embezzlement, misappropriation of funds, fraud, money laundering, and violations of tax laws and foreign exchange laws.

#### 3.2 Bribery

Bribery is an **inducement or reward offered, promised or provided for an illegal act or a breach of trust in order to gain commercial, contractual, regulatory or personal advantage** (monetary or non-monetary).

Some forms of bribery are easier to recognize such as payments in cash or kind from a third party to a company's employee or connected party in return for that employee providing a business advantage (such as an award of a contract or continued business or regulatory approval).

But sometimes actions which may seem perfectly acceptable business practices such as the giving or receipt of gifts and entertainment or the provision of sponsorship can constitute bribery where they are made in order to gain advantage in business transactions.

#### 3.3 General Prohibition of giving a Bribe

**You must not give, offer or promise to give, or authorize the giving of a Bribe to any person** in order to gain from that person or from the organisation to which that person belongs a commercial or contractual advantage for the Company or yourself.

Bribery constitutes a criminal offence, which can result in significant sanctions, such as:

- fines and other penalties for the Company;
- fines for or imprisonment of Personnel involved; and/or
- exclusion of the Company or other FUJIFILM Europe companies from public tenders.

The Company will neither make nor accept facilitation payments or “kickbacks” of any kind. These are typically small, unofficial payments made to secure or expedite a routine government action by a government official, uncommon in the UK but prevalent in some other jurisdictions.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You must always ask for a detailed invoice giving the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should always raise these with the Regional Counsel UK or the Compliance Officer of the Company.

#### 3.4 General Prohibition of receiving a Bribe

**You must not accept (i) any commercial or contractual, monetary or non-monetary advantage for the Company or yourself, or (ii) an offer to obtain such advantage** from any person, as consideration **for behaviour that is illegal or a breach of trust** and aims at providing that person or the organisation to which they belong with a benefit from the Company.

## 4. Gifts and Entertainment

Business decisions must always be based solely on commercial criteria and not influenced by gifts, hospitality or entertainment. But at the same time it is also important to establish and maintain cordial relationships with customers and showcase or demonstrate products or concepts in a convivial atmosphere. Entertainment and hospitality can be some of the tools of successful selling.

The UK Bribery Act recognises both these benefits and pitfalls:

*“Bona fide hospitality and promotions, or other business expenditure which seeks to improve the image of a commercial organisation, better to present products and services, or establish cordial relations, is recognised as an established and important part of doing business.*

*“It is, however, clear that hospitality and promotional or other similar business expenditure can [also] be employed as bribes” [Bribery Act 2010: Guidance: S6 p26]*

The following rules set out ethical and acceptable standards of behaviour which you should follow in relation to any gifts or entertainment and expands on the principles as set out in our Code of Conduct.

For the avoidance of doubt **these rules are not intended to apply in relation to the reasonable and appropriate expenses incurred in connection with discussions of specific business matters in business meetings** with persons with whom the Company does business or is seeking to do business (e.g. cost of meeting rooms and meals provided in the course of such meetings). You may continue to pay such expenses on behalf of the Company and may attend meetings at which such expenses are paid for by other persons. However, **entertainment (including meals)** of or by persons with whom the Company does business or is seeking to do business **which take place outside specific business meetings themselves are subject to the following rules.**

### 4.1 Gifts and Entertainment by the Company

Hospitality/Entertainment or gifts may be offered under the following conditions:

#### 4.1.1 Gifts

The practice of the Company giving gifts is not encouraged although it is recognised that in certain circumstances small value gifts may be appropriate. They must be reasonable in value, ethical and must reflect positively on the Company. Cash or cash equivalents such as vouchers or free of charge services are not permitted.

##### Fujifilm branded giveaways

The Company may give Fujifilm branded giveaways if reasonable and proportionate to the relationship between the Company and the other party.

##### Other gifts of small value (≤ GBP 50)

The practice of giving gifts other than Fujifilm branded giveaways is not encouraged even if it is of nominal value. However, for promotional purposes, the Company may give non-Fujifilm branded gifts of small value to Private Entities or Private Individuals as tokens of appreciation if approved by your line manager. The gift should be recorded on the Gifts/Event declaration (Annex 4.1.1).

##### Other gifts of higher value (> GBP 50)

Only in very exceptional cases may the Company give a gift with a value more than GBP 50 and then only to Private Entities or Private Individuals with the prior approval of your relevant divisional manager or functional head. The gift should be recorded on the Gifts/Event declaration (Annex 4.1.1).

## *4.1.2 Hospitality / Entertainment*

### General

One of the ways in which firms may get to know their customers, or customers get to know their suppliers is by providing corporate hospitality.

Entertainment of customers, potential customers or other third parties with a direct or potential business relationship with FFIC should be reasonable and proportionate, hospitable but not lavish.

There should never be an agreement or understanding that the provision of entertainment or hospitality will directly lead to the placing of an order or signing a contract. Particular care should therefore be taken when entertaining third parties during the negotiation of a new contract or order to avoid undue influence to secure business or a business advantage.

### Customer Relationship Events and Product Promotion Events

The Company may invite customers to Customer Relationship Events or Product Promotion Events as long as they are ethical and appropriate, reflect positively on the Company and the Fujifilm brand, and aim at building the relationship between the Company and the customer and/or showcasing our products. In some cases it may be appropriate to pay reasonable travel and accommodation costs. The guests invited should be customers or potential customers but not their spouses or anyone unconnected with the business.

## *4.1.3 Specific Rules for Public Officials and Healthcare Professionals*

Entertainment of Public Officials or Healthcare Professionals is not permitted other than at Customer Relationship Events or Product Promotion Events. Particular care should be taken in relation to these events when involving representatives from these sectors.

### Acknowledgement by the institution for Public Official's or Healthcare Professional's participation

When a Public Official or a Healthcare Professional is invited to a Customer Relationship Event or a Product Promotion Event, he/she shall disclose the details of the participation to his/her superior, and shall present his/her superior's written permission to the Company.

With the exception of Fujifilm branded giveaways, gifts should not be given to Public Officials or to Healthcare Professionals.

## *4.2 Receiving gifts or Hospitality/Entertainment*

Company Personnel may find themselves being entertained or in receipt of a gift. These may be accepted under following conditions:

### Gift of nominal value

You may receive and keep items of nominal value given as a gesture of goodwill such as diaries, calendars, pens and mugs. These do not need to be reported to the Company.

### Other gifts of moderate value (up to GBP 75)

Gifts which are of more than nominal value but have a value which appears to be less than GBP 75 may be received on behalf of the Company but should be passed to HR and recorded/reported on a Gifts/Event Declaration (Annex 4.1.1). All such gifts will be raffled for charity with all employees allowed to participate. When accepting such a gift, you should in thanking the donor tell them that the gift will be raffled for charity.

### Other gifts of higher value (> GBP 75)

Gifts which seem to exceed GBP 75 in value must not be accepted but returned. If in very exceptional circumstances you and your line manager believe it would cause offence to refuse the gift, it should be declared and raffled as above.

### Cash or cash equivalents

Irrespective of the amount, cash, vouchers or cash equivalents such as free of charge services must never be accepted.

### Hospitality/Entertainment

Hospitality/Entertainment may be accepted from time to time to the extent it is moderate, ethical, reasonable and proportionate to the relationship between the Company and the business partner. If the Company would not be likely to provide such a level of hospitality/entertainment itself you should consider carefully whether it is appropriate for you to accept such invitation.

To avoid unnecessary reporting of routine business entertainment where there is little risk of improper behaviour, lunch, dinner or drinks received do not have to be reported if their estimated value to the recipient is less than GBP 75.

But any meals with an estimated value higher than GBP 75 and any other corporate Hospitality/Entertainment of whatever value must be reported to HR via the Gifts/Event Declaration (Annex 4.1.1). Where the estimated likely value of such Hospitality/Entertainment exceeds GBP 150, you should consider seriously whether it is appropriate to accept and in any event obtain approval from your line manager **before** accepting the invitation.

## 5 Charitable Donations and Sponsorships

Ethical and appropriate charitable donations or sponsorship of charitable events can reflect positively on Fujifilm and are therefore in principle acceptable. However, no contributions of any kind must be made to political parties or pressure groups.

### 5.1 Donations

The Company may make donations to charitable organisations which are legal and ethical under local laws and practices. Donations must only be made for a charitable purpose. Donations must not be made for the purpose of inducing a business partner to enter into a business transaction with the Company.

The recipient of the donation must always be identified. Where the recipient is not the final charity (for instance in the case of a sponsored activity), the final charity must be identified as well.

### 5.2 Sponsoring

The Company may sponsor non-business related events by providing financial support, under the following conditions:

- The event is primarily dedicated to charitable, cultural, scientific or educational activities;
- The event organizer is independently responsible for and controls the selection of the event content and design, in particular its program, location, faculty, educational methods and materials and the Company is not involved in deciding those matters; and
- The support of an event by the Company is clearly stated in advance of and at the event; and
- The sponsorship is not made for the purpose of inducing a business partner to enter into a transaction or relationship with the Company.

### 5.3 Loan Equipment

The Company may loan equipment for demonstration, evaluation or use to businesses and trading partners providing they are documented and are as part of normal trading activities. The Company



may not loan equipment or other business assets to individuals, which might be construed as an inducement.

Equipment loans to Public Officials or Healthcare Professionals must be approved in writing in advance by the administration/management of the recipient's organisation with the following or similar approval statement: "*Content of this agreement acknowledged and approved* (official signature and stamp by authorised representative)".

## 6 Agents and other Business Partners acting on our behalf

### 6.1 General

The Company must ensure that any third parties acting for or retained by the Company as a distributor, agent, consultant or other representative in connection with any business of the Company ("**Prospective Business Partner**") comply with this Policy. They should be reviewed and asked by the department responsible for hiring the Prospective Business Partner to complete the questionnaire at Annex 6 (the result of which is to be recorded and filed as set out in Annex 6 and paragraph 8 below) prior to the Company entering into an agreement with them. Such agreement must contain the scope of the activities, services and remuneration.

Using a third party business partner acting on our behalf does not absolve us of our responsibilities; their conduct is – in the eyes of the law – our conduct and this Policy applies to them as much as to us. Therefore all agreements or contracts with Prospective Business Partners should contain at least the following statement or similar:

"It is an express condition that no party to this contract is directly or indirectly engaged in bribery or corrupt conduct."

#### Specific Rules for Public Officials and Healthcare Professionals:

An agreement regarding any services (including consultancy and research) to be provided by a Public Official or Healthcare Professional to the Company must only be concluded with the institution / organisation to which the Public Official or Healthcare Professional belongs and must be approved by the administration/management of the service provider's organisation with the following or similar approval statement: "*Content of this agreement acknowledged and approved* (official signature and stamp by authorised representative)"

## 7 Notification of violation and rights

### 7.1 Notification of violation

All Personnel and business partners acting on our behalf should uphold this Policy and avoid any conduct that might lead to a breach of this Policy.

If you believe or suspect that a conflict with this Policy has occurred or is likely to occur, you should notify your line manager as soon as possible. If you are unsure whether a particular act may constitute bribery or corruption, or if you have any other queries in this respect, please contact the Regional Counsel UK or another member of the European Legal Department.

Policy conflicts that have been notified should be reported immediately to the Regional Counsel UK, who shall then decide with the Compliance Officer of the Company (in conjunction with their respective counterparts at FUJIFILM European level) on any necessary investigation.

## 7.2 *Rights of Personnel*

The confidentiality of any Personnel who notify a suspected actual or potential violation will be maintained as far as is possible.

Fujifilm is committed to ensure that no one suffers any detrimental treatment as a result of refusing to take part in corruption; the same applies in the case of a notification in good faith of actual or potential corruption, unless the reporting person participated in the corrupt activity. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with refusing to take part in corruption or raising a concern in good faith.

## 8 Documentation, Record keeping and Transparency

All contractual arrangements with third parties should comply with the Corporate Policy Legal Affairs which aims to ensure our business conduct complies with all applicable legislation, establishes clear contract management rules, and documents and supports the management of legal risks. The Prospective Business Partner review results should be kept together with the respective business contract.

All behaviour or conduct covered by this Policy, in particular giving or receiving gifts or Hospitality/Entertainment or dealings with Public Officials or Healthcare Professionals must be properly documented to demonstrate that the company has complied with its legal and social obligations. **Annex 4.1.1 (Gifts and Event Declaration)** should be used for all non-Fujifilm branded gifts, for the receipt of gifts of more than nominal value and/or for meals of a value greater than £75 and any other Hospitality/Entertainment. This should be completed as soon as practicable.

The Company may – subject to resources - regularly publish internally its donation and sponsoring activities to demonstrate complete transparency in these activities and as a reminder of this Policy.

## 9 Training and Monitoring

The Company shall train Personnel on the principles of this Policy and shall monitor compliance with this Policy.

## 10 Roles & Responsibilities

The **Company's management** is responsible for ensuring the compliant business conduct of its operations. At the same time each **business domain** and **function** are responsible for ensuring their own compliance with this Policy. Through direction and consultation, management should ensure consistency of approach and decisions.

Personnel should each act in a way to prevent any form of bribery or other corruption and avoid any activity that might lead to, or suggest, a breach of this Policy.

The **Compliance Officer of the Company** is responsible for:

- establishing and maintaining structures of the Company to prevent and combat corruption;
- promoting the implementation of this Policy throughout the Company;
- supporting all relevant departments and Personnel in fulfilling their respective responsibilities under this Policy.
- assisting in any investigation by the Compliance Officer of FUJIFILM Europe when an actual or potential violation is notified.

The **Regional Counsel UK** is responsible for supporting the Compliance Officer of the Company with the implementation of this Policy including the training to Personnel, and for providing adequate advice on legal issues related to this Policy.

The **Compliance Officer of FUJIFILM Europe** is responsible for:

- establishing and maintaining structures of FUJIFILM Europe to prevent and combat corruption;
- promoting the implementation of the FF Europe Corporate Policy Anti-Corruption throughout FUJIFILM Europe;
- supporting all relevant departments and personnel of FUJIFILM Europe in fulfilling their respective responsibilities under the FF Europe Corporate Policy Anti-Corruption.
- organising an investigation when an actual or potential violation is notified.

The **Head of Legal Europe** is responsible for supporting the Compliance Officer of FUJIFILM Europe with the implementation of the FF Europe Corporate Policy Anti-Corruption including the training to personnel of FUJIFILM Europe, and for providing adequate advice on legal issues related to the FF Europe Corporate Policy Anti-Corruption, in close cooperation with the respective personnel of the relevant business domain and the corporate division.

## 11 Governance

The ownership of the FUJIFILM Europe Corporate Policy Anti-Corruption on which this Policy is based rests with the European Legal Department of FUJIFILM Europe. Any intended changes to the FF Europe Corporate Policy Anti-Corruption shall be discussed well in advance with the Compliance Officer of FUJIFILM Europe with the aim of finding a mutual understanding about, and an adequate implementation of, any requisite change. In this process stakeholders in other departments of the business domains or corporate division as well as FUJIFILM Europe companies shall be adequately consulted. Any changes to the FF Europe Corporate Policy Anti-Corruption may require changes to this Policy.

## 12 Glossary

Anti-Corruption Disclosure Statement	General statement to be requested on a regular basis from Prospective Business Partners prior to entering into business with them and in an ongoing business relationship regularly before the relationship is prolonged or renewed – see Annex 6.
Bribe	Any inducement or reward offered, promised or provided for an illegal act or a breach of trust in order to gain any commercial, contractual, regulatory or personal advantage (monetary or non-monetary).
Bribery	See paragraph 3.2 of the Policy
Company	FUJIFILM Imaging Colorants Limited
Corruption	See paragraph 3.1 of the Policy.
European Legal Department	The legal department of FUJIFILM Europe, with its main office at FEG in Düsseldorf and with members in various other companies.
FEG	FUJIFILM Europe GmbH, Düsseldorf, Germany
FEN	FUJIFILM Europe B.V., Tilburg, The Netherlands
FUJIFILM Europe	FEN and its direct / indirect 100% subsidiaries
Customer Relationship Event	Any general product promotion or customer relationship events which is pre-authorized by management of the Company, open in general to existing or future customer groups, is ethical and socially adequate, reflects positively on the Fujifilm brand and serves the purpose of intensifying relationships with current or future customer groups
Healthcare Professional	The individuals of a Public Entity or a Private Entity in the healthcare field, who are involved in the decision making process resulting in the procurement of Company's products and services. This includes doctors, nurses, hospital managers, and consultants retained by hospitals, the Company or other consultants in the context of the Company's activities.
Hospitality/Entertainment	Meals, social events and other socially acceptable courtesy treatments, but excluding gifts.
Personnel	Any officer or employee of, or individual contractor working for, Company
Policy	This Corporate Policy Anti-Corruption of the Company
Private Entity	A privately funded company, institution or organisation.
Private Individual	An officer, employee of or individual contractor working for, a Private Entity
Product Promotion Event	An event organized by Company which focuses on the dissemination or exchange of specific, in particular technical, information about Company products or services, or scientific information relevant for Company's products or services e.g. specific workshops, product presentations, or educational seminars etc.

Prospective Business Partner	See paragraph 6.1 of the Policy
Public Entity	A domestic or foreign government organisation, institution, office, or authority, quasi-government organisation, public international organisation or contractor organisation providing services to any of the foregoing.
Public Official	An officer or employee of, or official or individual contractor working for, a Public Entity.

## ANNEX 4.1.1 GIFTS AND EVENT DECLARATION

### Giving of Gifts

***Fujifilm branded gifts may be given freely; other gifts up to a value of £50 need line manager approval. Gifts with a value of more than £50 need prior approval by your Manager. No gifts should be given to public officials other than Fujifilm branded gifts. All gifts – apart from Fujifilm branded giveaways – should be recorded as set out below***

A Gifts/Event Declaration must be sent by email to Rose Osborne HR Blackley ([rose.osborne@fujifilmic.com](mailto:rose.osborne@fujifilmic.com)) with the email header “Gifts/Event Declaration - Giving” and must contain the following information:

Date Gift given

Person Gift given to and the name of their organisation

Type of Gift given

Value

### Receipt of Gifts/Entertainment

***Meals received with an estimated value of more than £75, and all hospitality, should be recorded as set out below. Where the estimated value exceeds £150 prior managerial authorisation is required.***

***Gifts received should be recorded as set out below (with gifts under £75 being sent to HR for raffling and those over £75 normally being returned to the sender) and a thank you should be sent to the sender explaining the policy.***

A Gifts/Event Declaration must be sent by email to Rose Osborne HR Blackley ([rose.osborne@fujifilmic.com](mailto:rose.osborne@fujifilmic.com)) with the email header “Gifts/Event Declaration - Receiving” and must contain the following information:

Date Gift/Entertainment received

Organisation received from and contact name

Type of Gift/Entertainment

Approximate Value

Where managerial approval is required a word document should be created containing the above information and the relevant manager should sign the document and print their name below the signature. A scan of the signed word document should be created and sent to Rose Osborne in an email as above.

You should provide a Gifts/Event Declaration as soon as reasonably practicable after the giving of the Gift or receipt of the Gift/Entertainment.

## Annex 6

### Anti-Corruption Disclosure Statement

As part of its anti-corruption compliance program, FUJIFILM Imaging Colorants Limited (the “Company”) requires that all third parties wishing to be considered for retention by the Company as a distributor, agent, consultant or other representative in connection with any business of the Company (the “Prospective Partner”) provide the following:

<p>1. List all the countries in which Prospective Partner will act for or on behalf of the Company as a distributor, agent, consultant or other representative:</p> <p>Countries:</p>
<p>2. If the answer to 1 is other than the UK, do any of the countries mentioned have a corruption perception index rating below 5 according to the following website (under the Results tab): <a href="http://www.transparency.org/policy_research/surveys_indices/cpi?">http://www.transparency.org/policy_research/surveys_indices/cpi?</a></p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>If “yes”, please list:</p>
<p>3. Has the Prospective Partner or, to the best of its knowledge, any of its officers, directors, employees, affiliates, agents or other representatives ever been the subject of an investigation of criminal law violations or any governmental investigation relating to bribery, corruption, fraud or dishonesty, or found to be in violation of any criminal law or otherwise subject to penalty from any governmental agency relating to bribery, corruption, fraud or dishonesty, whether in the UK or abroad?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>If “yes”, please give details below:</p>
<p>4. Will the Prospective Partner interact with any public official in acting for or on behalf of the Company as a distributor, agent, consultant or other representative? For purposes of this statement, “public official” means any (i) officer or employee of a government or governmental department, agency or instrumentality or any person acting in an official capacity on behalf of a governmental entity, (ii) political party or party official, or any candidate for political office, (iii) official or employee of any public international organisation, such as the World Bank, United Nations or World Health Organisation, (iv) person acting on behalf of any government-owned or government-controlled entity, such as a state hospital, university or public utility, including any employee of such an entity, or (v) spouse or immediate family member of such person.</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>If “yes”, please give details below:</p>
<p>5. If the Prospective Partner is a company, does the Prospective Partner or, to the best of its knowledge, any of its staff have any family or business ties, employment relationship or</p>

<p>any other form of affiliation with any public official, which ties, relationship or affiliation may substantially influence decision of any public officials?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>If “yes”, please give details below:</p>
<p>6. If the Prospective Partner is an individual, indicate whether or not the following is a correct statement:</p> <p><i>Neither Prospective Partner, Prospective Partner’s spouse nor any member of Prospective Partner’s or Prospective Partner’s spouse’s family is now serving, or ever has served, in a salaried or appointive position within the government of any country listed in paragraph 1 above.</i></p> <p><input type="checkbox"/> Correct                      <input type="checkbox"/> Not Correct</p> <p>If “not correct”, please provide details:</p>
<p>7. Is Prospective Partner familiar with the prohibitions of anti-corruption laws that may be applicable to Prospective Partner’s business (including, but not limited to, the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act)?</p> <p><input type="checkbox"/> Yes                              <input type="checkbox"/> No</p>
<p>8. Does Prospective Partner have its own compliance program for ensuring compliance with applicable anti-corruption laws?</p> <p><input type="checkbox"/> Yes                              <input type="checkbox"/> No</p> <p>If “yes”, please provide a copy of the program, or describe the outline thereof:</p>  <p>If “no”, please briefly describe measures instituted within Prospective Partner for ensuring compliance with applicable anti-corruption laws.</p>

I hereby certify that each of the statement above is true, accurate and complete.

By:

Print Name:

Title:

Date:

On completion, please scan a copy of this form and send it to the Compliance Officer of the Company (cc Regional Counsel UK).



## Annex 7

### High-Level Summary

Although this summary is not a substitute for the full Corporate Policy, it should prove a useful guide for quick and easy reference in most circumstances:

<b>Bribery:</b>		<ul style="list-style-type: none"> <li>General prohibition on bribery and/or kickbacks with special attention to giving/receiving gifts and/or hospitality (see below).</li> </ul>
<b>Giving:</b>	<b>Gifts</b>	<ul style="list-style-type: none"> <li>Fujifilm branded gifts are OK.</li> <li>Other gifts of value up to £50 require line managerial approval.</li> <li>Gifts of value more than £50 only very exceptionally allowed with prior authorisation of local BD manager.</li> <li>No gifts to public officials or healthcare professionals.</li> </ul>
	<b>Hospitality</b>	<ul style="list-style-type: none"> <li>Should be “reasonable and proportionate”.</li> <li>Should ideally cover more than one customer at a time.</li> <li>Should not take place during contact negotiations.</li> <li>Entertainment of public officials discouraged.</li> </ul>
	<b>Record keeping</b>	<ul style="list-style-type: none"> <li>An internal record of all recipients of hospitality, preferably on invoice or expense claim.</li> <li>All gifts (other than Fuji-branded giveaways) <b>must</b> be reported on the <b>Gifts and Hospitality Events Declaration</b>.</li> </ul>
<b>Receiving:</b>	<b>Gifts</b>	<ul style="list-style-type: none"> <li>Diaries, calendars, pens etc do not require reporting.</li> <li><b>All other gifts with values up to £75 to be declared, pooled and raffled to the whole company for charity.</b></li> <li><b>Gifts worth more than £75 to be returned.</b></li> </ul>
	<b>Hospitality</b>	<ul style="list-style-type: none"> <li>Meals received with a value greater than £75/head, and all other Hospitality to be reported.</li> <li>Meals/Hospitality with a value greater than £150/head should be considered very carefully with prior approval required from line manager.</li> </ul>
	<b>Record keeping</b>	<ul style="list-style-type: none"> <li><b>Meals worth more than £75 and all Hospitality to be reported on separate form mentioned above.</b></li> <li><b>Gifts received to be pooled and also reported.</b></li> </ul>