Modern Slavery and Human Trafficking Statement

Introduction from Richard Fabian,
President & COO of FUJIFILM SonoSite, Inc.

FUJIFILM SonoSite, Inc. (“SonoSite”), a wholly owned subsidiary of FUJIFILM Holdings America Corporation, is a manufacturer of bedside and point-of-care ultrasound equipment in the Medical Device and Imaging Technologies sector. We are a part of the group of companies owned by FUJIFILM Corporation (“FUJIFILM Group”). Our ultimate parent company is FUJIFILM Holdings Corporation. Both FUJIFILM Holdings Corporation and FUJIFILM Corporation have their 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.

The FUJIFILM Group is committed to improving our 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.

FUJIFILM Holdings Corporation published the FUJIFILM Group 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 is also expected to comply with this Statement. 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 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, in June 2015 FUJIFILM Corporation adopted the FUJIFILM Corporate Social Responsibility Procurement Guidelines for suppliers (“Supplier Guidelines”) under which suppliers 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 (including in the context of conflict minerals). The Supplier Guidelines have also been adopted by FUJIFILM Group companies in other parts of Asia and North America and will continue to be introduced at other FUJIFILM Group companies.
In addition, through its adoption of its Sustainable Value Plan 2030 (SVP 2030) in August 2017, FUJIFILM Holdings Corporation’s stated goal 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.

Organization structure

SonoSite has over 850 employees and direct operations in the United States, Canada, France, Germany, Spain, United Kingdom, Australia, New Zealand, the Netherlands and India.

Our business

SonoSite is the world leader in bedside and point-of-care ultrasound equipment, and an industry leader in ultra high-frequency micro-ultrasound technology. SonoSite systems are used by over 21 medical specialties and provide clinicians around the world with a cost-effective tool for improving patient safety and workflow efficiency. We are represented by numerous subsidiaries and a distribution network spanning the globe.

Our supply chains

Our supply chains include products and services sourced from both domestic and foreign suppliers. To assist in the development and manufacturing of our ultrasound equipment, we source a wide range of products and services from our suppliers, including raw materials, packaging and development services. Our current foreign suppliers include both small and large scale providers, and are located in regions such as Australia, North America, Europe, and Asia.

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 to prevent and mitigate any human rights abuses.

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 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.

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 North America (if any), procurement staff 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 by obligating suppliers to permit and cooperate with any regulatory inspections of their facilities relating to the supplied products and/or services, or their production. Additionally, our suppliers warrant that all goods and services sold to us have been produced, sold, delivered and furnished in strict compliance with all applicable laws and regulations including equal employment opportunity and Affirmative Action.

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 the ethical business principles set out in the Supplier Guidelines. The Supplier Guidelines cover items listed in the FUJIFILM Group Charter for Corporate Behaviour, FUJIFILM Group Code of Conduct, and FUJIFILM Group Human Rights Statement that FUJIFILM Group companies request their suppliers to follow, as well as all the items covered in the Code of Conduct of the Responsible Business Alliance (RBA).

FUJIFILM Corporation also uses the FUJIFILM Group Supplier CSR Checklist to assess suppliers’ compliance with the Supplier Guidelines where considered necessary. As a result of suppliers completing these Checklists since FY2015, primary suppliers in Japan, Europe and the U.S. have been assessed as a low CSR risk. In the year ending 31 March 2019, FUJIFILM Corporation has extended the request to complete these Checklists to other suppliers in Japan and Europe. In addition, FUJIFILM Corporation conducted audits of suppliers to its Chinese manufacturing subsidiary and requested correction of risk factors.
For products that we source ourselves and for services, our suppliers warrant that all goods and services sold to us have been produced, sold, delivered and furnished in compliance with all applicable laws and regulations.

SonoSite is committed to ethical behavior. We adhere to our internal Standards of Business Conduct and Compliance with Law Program 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 Behaviour
- 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 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

With effect from 1 April 2019, FUJIFILM Holdings Corporation revised the FUJIFILM Group Charter for Corporate Behaviour and FUJIFILM Group Code of Conduct. They have been translated into 24 languages and global education by e-learning is being carried out including disseminating the FUJIFILM Group Charter for Corporate Behaviour and FUJIFILM Group Code of Conduct and the FUJIFILM Group Human Rights Statement to all FUJIFILM Group employees.

To combat the human rights risk within the supply chain, FUJIFILM Group companies will continue to promote the actions with the framework of ethical procurement. In the current year, they will monitor the improvement status of those suppliers where human rights related risks were found and correction measures specified.
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 take the following further steps to combat slavery and human trafficking: adopt and support all corporate policies related to business ethics and respect for basic human rights, and 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 SonoSite, Inc. for the financial year ending 31 March 2019.

Richard Fabian  
President & COO  
FUJIFILM SonoSite, Inc.

This statement was approved by the Board of Directors of FUJIFILM SonoSite, Inc. on September 30, 2019.