

Compliance

Ensuring thorough compliance in line with our code of conduct.

Approach to Compliance Based on *The FUJITSU Way Code of Conduct*

Along with articulating the mission, policy and values of the Fujitsu Group, *The FUJITSU Way* also includes a code of conduct stipulating the basic rules that each and every employee is expected to follow in realizing these aims. This code of conduct clearly spells out the stance of the Fujitsu Group with respect to strict observance of laws, regulations, and social norms, and indicates the principles, standards, and common basic values governing our business activities.

The FUJITSU Way Code of Conduct (October 2002)

The FUJITSU Way Code of Conduct indicates basic principles, standards, and shared values concerning how Fujitsu Group employees are to conduct themselves. The Code of Conduct is made up of the six tenets listed below.

- **Respect Human Rights**
We will respect the rights of every individual. Human rights are not to be infringed through sexual harassment or discrimination on the basis of race, color, religion, creed, sex, social status, lineage, physical or mental disability or sexual orientation. Such discrimination shall be neither encouraged nor tolerated.
- **Comply with Laws and Regulations**
We will adhere to all applicable laws and social norms whether in Japan or overseas. Compliance shall be complete and without exception.
- **Maintain Confidentiality**
Each employee shall appropriately handle and safeguard information held within or passing through our company in accordance with its type, including company confidential information, third-party confidential information, and personal data.
- **Protect Intellectual Property**
We recognize intellectual property as an essential resource underpinning our corporate activities, fully understand the legal significance of these rights, and, on that basis, make efforts to obtain, maintain and utilize these rights. We will respect other companies' intellectual property while protecting our own.
- **Reject Unethical Behavior**
No employee shall use his or her position or role in the company for personal gain.
- **Act with Fairness in Our Business Dealings**
In our dealings with customers, business partners and competitors, we must in every case act in a manner that is fair.

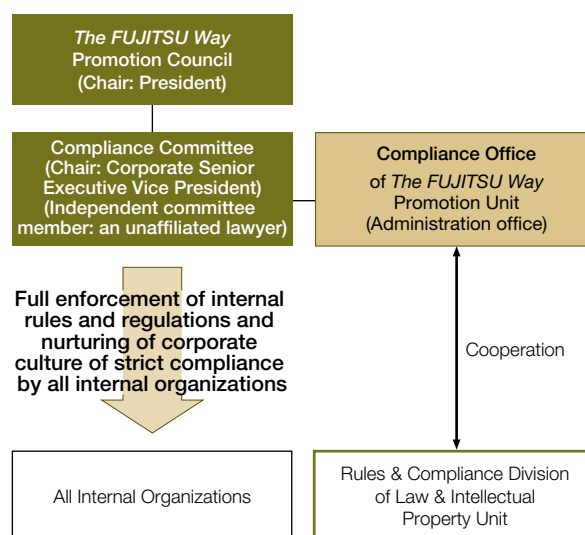
Compliance Promotion Structure

In 2004, we established the Compliance Committee under *The FUJITSU Way* Promotion Council, which is currently chaired by a corporate senior executive vice president and including an independent lawyer as an outside member.

Based on the stance of strict compliance with social norms indicated in *The FUJITSU Way Code of Conduct*, the Compliance Committee promotes the thorough diffusion and implementation of internal rules, the nurturing of a corporate culture of strict compliance, and the construction of necessary internal systems and structures.

Furthermore, we also carry out activities aimed at instilling an awareness of compliance in cooperation with the Rules & Compliance Division of the Law & Intellectual Property Unit.

Compliance Promotion Structure



Helpline System

In September 2004, we took a further step to promote compliance with the Code of Conduct, establishing an internal helpline system at Fujitsu to handle reports from employees and provide consultation.

The helpline serves three purposes. It is a consultation resource for employees who, in the course of carrying out their job responsibilities, are unable to determine whether a particular action is potentially in violation of *The FUJITSU Way*. It also serves as a line of reporting for employees when they are unable to go through normal management channels. In addition, it can be used when an employee has concerns that something may violate laws or regulations. The helpline is available to all Group employees in Japan, including on-loan, contracted, part-time and other short-term employees as well as temporary staff.

In addition to this helpline, each of our domestic Group companies has built and started operating similar helpline systems.

Information Security

Our Approach to Information Security (System of Related Rules)

We are working to strengthen information security based on our policy of promoting appropriate information management and use in strict compliance with internal rules and regulations. *The FUJITSU Way* Code of Conduct clearly spells out our confidentiality policy and is the foundation of our approach to information security. We have also devised seven separate sets of rules relating to information management, including Rules for Management of Confidential Information, Rules for Management of Personal Data, and Rules for Management of Third Parties' and Customers' Confidential Information, which we are working to assure are fully observed at Fujitsu and domestic Group companies.

Strengthening Information Security at the Business Group Level

To assure the strongest possible information security, we are working to implement a company-wide information security management structure. As part of that effort, we are building dedicated information security management systems within each business group to promote strict information security measures that reflect the particular characteristics of each individual business.

In our various business units and domestic Group companies we have acquired ISMS (Information Security Management System) certification and are working to provide the most thorough management possible of customers' and others' confidential information.

Personal Data Protection Initiatives

In addition to implementing a Personal Data Protection Policy, we have strengthened our personal information management system by stipulating Rules for Management of Personal Data based on Act on the Protection of Personal Information in Japan, which came into full force in April 2005.

For instance, we manage personal data in each business unit according to the Rules for Management of Personal Data.

With regard to the information that is specifically required to be handled carefully among the personal information managed by the business units, detailed rules are prepared for each relevant project, and a manager responsible for auditing assesses the situation for observance of those rules and report it to the president.

Although up to now we have acquired privacy mark certification only for divisions for which it was deemed necessary for business development, we plan to acquire company-wide Privacymark Certification in fiscal 2007. Furthermore, domestic Group companies are also promoting thoroughgoing management of personal information by acquiring Privacymark Certification individually, according to their business needs.

Protecting Intellectual Property

Intellectual Property Protection Policy

In 2002, we introduced *The FUJITSU Way*, which presents the core principles guiding the corporate and individual actions of the Fujitsu Group and describes the shared values guiding individual employees in their business activities. *The FUJITSU Way* explicitly states that we will protect intellectual property. Fujitsu Group employees understand that intellectual property is a critical business asset that supports corporate activities and, in full recognition of the legal meaning of intellectual property rights, strive to acquire, maintain, and use those rights.

Promotion and Management Structure

Our intellectual property strategic promotion structure is a comprehensive organization that has the following divisions within the Law & Intellectual Property Unit: a division responsible for strategic proposals and practice for acquisition and management of intellectual property rights; a division that handles licensing negotiations for intellectual property rights; a law division; a division that proposes company internal rules and is responsible for educating employees on those rules; and a division that investigates information related to Fujitsu's business and provides that to each division within the company.

We also have a research subsidiary, Fujitsu Techno Research Limited, that specializes in prior patent searches (to determine whether a patent has already been awarded) and clearance searches (to determine potential infringement of patents held by other companies) when applying for patents.

Furthermore, within in each business group, there is also a unit that promotes the protection of patents and other intellectual property. These units engage in concrete activities to take advantage of particular intellectual property within businesses and in research and development.

Respecting the Patents of Other Companies

Infringing the patents of other companies would ultimately threaten the viability of the Fujitsu Group and also cause serious difficulties for our customers and the markets we serve. We take great care to avoid any potential patent infringement, not only through various internal rules and procedures, but at every stage, from research and development to the point a new product or service is released, by thoroughly investigating other companies' patents. At the same time, in conformance with legal practices, we deal resolutely and swiftly with any and all infringements by other companies of Fujitsu's patent rights.



Intellectual Property Report

<http://www.fujitsu.com/global/about/ir/library/intellectualproperty/>