

CODE OF ETHICS POLICY

Policy Statement

It is Fujitsu UK & Ireland's policy to conduct its business fairly, with due regard to the interests of its employees, customers and suppliers, the communities in which it operates and in compliance with the local laws and regulations of each country where it does business.

Authority & Accountability

The ethical aspects of Fujitsu UK & Ireland and its business are the sole responsibility of the Chief Executive, who has delegated day to day responsibility for such matters including the enforcement of this Code to the General Counsel.

All employees are required to be familiar with this policy and must conduct the activities for which they are responsible within the scope of their authority and in such a way as to promote and maintain Fujitsu UK & Ireland's reputation and the trust and confidence of those with whom it deals.

Compliance with applicable laws

All Employees must respect and comply with all applicable laws, treaties, government regulations and statutes. All employees must ensure that they understand all relevant laws and regulations that affect Fujitsu's business and seek to ensure that Fujitsu does not, through its actions, violate those laws.

Human rights

Fujitsu UK & Ireland endorses the principles of the United Nations Universal Declaration of Human Rights and applies these standards by treating all individuals fairly and with respect.

How we compete

Fujitsu UK & Ireland will compete fairly and ethically in the markets in which it operates, ensuring that it complies in a proper and timely manner with its contractual obligations to customers, suppliers and others. Employees must ensure that Fujitsu will comply with all applicable laws relating to competition

Bribery

Fujitsu competes on the basis of the quality and price of its products, services and solutions. Nobody within Fujitsu International Business, or acting on behalf of Fujitsu International Business, may give or accept, directly or indirectly, a bribe in any form. "Bribe" means any advantage, whether in monetary or other form. Examples of prohibited behaviour include

- Giving or promising money, goods or services to a government official or customer employee
- Paying a gratuity to officials or employees to expedite an administrative action
- Payment of a commission that is disproportionate to the services provided

Employees must ensure that where Fujitsu does business through consultants, intermediaries or other third parties, they must endeavour to ensure that they also comply with the above rules.

In addition, when doing business with national governments and government owned enterprises, employees shall:

- comply with special legal and regulatory requirements that are commonly associated with government transactions
- be truthful and accurate when dealing with government officials and agencies
- ensure that reports, certifications, statements and proposals are current, accurate and complete
- ensure that contractual requirements are adequately identified and understood, and that we do not materially deviate from contract requirements without written approval of an authorized government official
- avoid any incorrect or unauthorized cost charging on government contracts
- be especially careful when dealing with foreign governments, or governments of developing countries or emerging markets, which may be less familiar to us.

Conflicts of interest

Employees shall not enter into a situation in which their personal or financial interests conflict, or may conflict, with those of Fujitsu UK & Ireland or its customers or suppliers. Any such conflict or potential conflict must be reported immediately to a line manager.

Employees must not use their position, role, corporate information, corporate facilities or assets, or act in a way contrary to their corporate obligations, to seek or gain benefits for themselves, relatives, friends or other third parties.

Employees must ensure that they are fully aware of and understand the guidance on gifts and entertainment before

- giving or accepting any gift
- engaging in customer entertainment
- giving or receiving any other benefit.

Insider Trading

The Fujitsu UK & Ireland Legal Compliance Policy requires Employees to comply with laws prohibiting insider trading in securities, whether of Fujitsu Limited, of a supplier, of a customer or of any other company or organisation. In addition, Employees must ensure that, even where their dealings in securities would not breach such laws, such dealings neither involve, nor may reasonably be seen as involving, any sharp practice or lack of fair dealing on the part of the Employee.

Financial and asset protection

It is essential that Fujitsu UK & Ireland's accounting procedures and processes are strictly adhered to. All Employees must ensure that all payments to third parties are "transparent" and duly authorised in accordance with the established authorisation and accounting procedures, and that no tax planning arrangements are entered into that rely for their success on non-disclosure or mis-disclosure of the facts to tax authorities.

Employees will not use, sell, lease or dispose of any company assets, including software, hardware, or other equipment or facilities, for any purpose other than transacting or undertaking Fujitsu's legitimate business purposes only.

Confidentiality

Employees must comply with all laws and regulations relating to the processing and protection of personal information and provide adequate safeguards when personal information is transferred to countries which do not have laws protecting such information, in accordance with the Fujitsu UK & Ireland Data Protection Policy

- In addition, Employees must take adequate steps to secure and protect Fujitsu's confidential information and ensure that Fujitsu does not disclose such information to anyone outside the company without following correct procedures (for example ensuring that there is a binding non-disclosure agreement in place)
- only use Fujitsu's confidential information for purposes of the business of Fujitsu and only make records, copies or databases of Fujitsu information where directly necessary for Fujitsu business
- respect and protect Fujitsu's confidential information even after their employment with Fujitsu has ended.
- ensure that information from Fujitsu's customers or business partners is handled and used appropriately in accordance with the terms and conditions defined and specified in each contract with them, including terms and conditions related to the intended use, management and duration of confidentiality of such information.

Political activity and payments

Fujitsu UK & Ireland does not make donations for political purposes, whether these are direct or indirect, and whether made to candidates, office holders or political parties on behalf of Fujitsu unless authorized in writing by a senior level of management.

Communication

The Policy Owner is responsible for the communication of this policy to all employees.

Implementation

Any questions about any aspect of this policy should be referred to the relevant line manager or member of the Legal Department.

If unethical behaviour comes to attention, it should be reported to the line manager or member of the Legal Department.

Fujitsu UK & Ireland will not tolerate retaliation against any employee because they have made a report in good faith regarding a genuine suspected breach or violation of this policy.

Applicability

This policy applies to Fujitsu UK & Ireland. This means all Employees, Contractors and businesses carried on by Fujitsu Services Limited and its subsidiaries and any other company or organisation that is managed by the Chief Executive Officer, Fujitsu United Kingdom and Ireland.

Policy Owner

This policy is owned by David Roberts, Commercial, Legal and Business Assurance Director and managed on his behalf by Amanda Craib, Compliance Officer

For Further Information:

If any person to whom this Code applies has any concerns about this Code or its applicability, he/she can consult:

Amanda Craib, Compliance Officer or [HR Helpline, HR Direct](#) on +44 (0)843 354 7744

An external hotline is also available to report such concerns. All reports will be passed to Fujitsu UK & Ireland Security, on an anonymous basis if so requested. The hotline number is +44 (0)0808 234 5279.

