Respecting Human Rights

Third Modern Slavery Statement for the reporting period 1 April 2021 - 31 March 2022

Fujitsu Australia Limited
Fujitsu acknowledges Aboriginal and Torres Strait Islander peoples as the First Nations of Australia. We acknowledge the traditional custodians of the lands on which our company is located and where we conduct our business. We pay our respects to Ancestors and Elders, past and present. Fujitsu is committed to honouring Australian Aboriginal and Torres Strait Islander peoples’ unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society.

Artist: Jasmine Sarin (JS Koori Designs).
Message from the CEO

I am proud to present Fujitsu Australia’s third Modern Slavery Statement. This statement highlights our most impactful year of action against this violation of human rights yet.

It is a bitter reality that the most vulnerable in our communities around the world still fall victim to modern slavery today. A reality that we at Fujitsu are committed to reducing to zero.

Unprecedented operational challenges faced in our FY21 (April 2021 to March 2022), such as disruptions to global supply chains and heightened COVID-19 health and safety concerns, have further aggravated existing modern slavery risks. Despite this, at Fujitsu, our respect for human rights is unwavering and we put even more focus on ensuring we assessed end to end supply chains.

These disruptions further highlight that without being able to protect the wellbeing and rights of people, throughout our entire value chain, Fujitsu would not be able to deliver on its purpose to make the world more sustainable by building trust in society through innovation. At this crucial time to do so, our purpose embeds respect for the dignity, worth and safety of individuals Human Rights as a number one priority and a zero tolerance for modern slavery.

In the last year, we ramped up the combination of due diligence and data analysis, to scrutinise our operations and supply chain, identifying high risk and high impact opportunities. I invite you to read more of this year’s key highlights and our ambitious 3-year plan to further the elimination of modern slavery from our global business.

The Board of Fujitsu Australia Limited have approved this Modern Slavery Statement on 1st Sept 2022.

Graeme Beardsell
CEO Asia Pacific (APAC)
Reporting Entity

This is the third Modern Slavery Statement of Fujitsu Australia Limited (Fujitsu Australia or We, Us or Our) (ABN 19 001 011 427) which has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act). Fujitsu Australia was incorporated in New South Wales, Australia in 1972, as FACOM Australia Limited (FACOM – Fujitsu Automatic Computer) and changed its name to Fujitsu Australia Limited, in 1985. It currently has its registered office at 118 Talavera Road, Macquarie Park, New South Wales.

Organisational Structure

Fujitsu Australia is a wholly owned subsidiary of Fujitsu Limited, a company incorporated and headquartered in Tokyo, Japan. Fujitsu Limited was founded 86 years ago in June 1935, and today is a leading Japanese information and communication technology (ICT) company offering a full range of technology products, solutions and services. As of 31 March 2022, Fujitsu Limited and its 364 consolidated subsidiaries and 20 affiliates throughout the world, including Fujitsu Australia (Fujitsu Group), employed more than 126,000 people who helped our customers in more than 180 countries. Fujitsu Limited reported consolidated revenues of 3.59 trillion yen ($32B USD) for the fiscal year ended March 31, 2022.

Fujitsu Australia is the primary trading entity of Fujitsu operating in Australia. Fujitsu New Zealand Limited (Fujitsu New Zealand) is a wholly owned subsidiary of Fujitsu Australia operating in New Zealand. A list of Fujitsu Australia Limited subsidiaries is available here. Fujitsu Australia and Fujitsu New Zealand (together Fujitsu Oceania) have 29 locations including 15 offices, 8 warehouses, and 6 data centres.

Fujitsu Oceania reported consolidated revenues of more than $970M AUD for the fiscal year ended 31 March 2022. The Fujitsu Group Integrated Report for the year-end 31 March 2022 can be found here. As of that date, Fujitsu Australia and New Zealand has over 3,500 employees working across different domains for the organisation.
Fujitsu Australia and New Zealand at a glance

+30 Fujitsu locations

+1,500 customers

+3,500 staff

50 years of innovation

32 partners

+43,000 square metres of data centre floor space

$970M of revenue and one of the leading ICT companies in Oceania

$4.1M spent more than $4.1M with First Nations owned businesses since 2017

6th largest IT services provider in Australia and New Zealand

*All amounts are in Australian dollars unless another currency is indicated.
Our governance framework

Fujitsu has a solid corporate governance framework in place, and through our policies we communicate our values and expectations that we do not tolerate modern slavery. The Fujitsu Way defines our corporate vision philosophy and principles and comprises 3 parts: “Our Purpose”, “Our Values” and “Code of Conduct”.

Each principle is supported with regional policies. In Oceania we have policies that cover antitrust and competition, recruitment, conflicts of interest, supply chain and whistleblowing. These are reviewed annually to ensure they are up to date.

Each year on the UN’s International Anti-Corruption Day in December, Fujitsu’s annual Global Compliance Training is rolled out, which is an online training requirement for all Fujitsu employees, which reinforces Fujitsu’s Code of Conduct and Global Business Standards.

<table>
<thead>
<tr>
<th>Our Purpose</th>
<th>Our purpose is to make the world more sustainable by building trust in society through innovation.</th>
</tr>
</thead>
</table>
| Aspiration | • Set ambitious targets and act with agility.  
• Embrace diversity and create original ideas.  
• Stay curious and learn from failures and experiences.  
• Deliver positive impact through human centric innovation. |
| Trust       | • Honor promises and exceed expectations.  
• Act with ethics, transparency and integrity.  
• Work autonomously and unite for common goals.  
• Contribute to a trusted society using technology. |
| Empathy     | • Strive for customers’ success and their sustainable growth.  
• Listen to all people and act for the needs of our planet.  
• Work together to solve global challenges.  
• Generate shared value for our people, customers, partners, community and shareholders. |
| Code of Conduct | • We respect human rights.  
• We comply with all laws and regulations.  
• We act with fairness in our business dealings.  
• We protect and respect intellectual property.  
• We maintain confidentiality.  
• We do not use our position in our organization for personal gain. |
Global Human Rights Statement for Fujitsu

Globally, the Fujitsu Group has several global human rights policies, processes and training programs in place. "We respect human rights" is a principle that underpins all our corporate activities, and we are working to ensure that this concept becomes an integral part of the day-to-day actions of all our employees in our group.

**Fujitsu Group Human Rights Statement** sets out Fujitsu’s support for the ten principles of the United Nations Global Compact based on universal principles regarding human rights and rights at work, such as the Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. The Human Rights Statement commits Fujitsu Group to regularly reviewing and updating the progress on its efforts and annually communicating the results through its Corporate Social Responsibility report and other communication tools. The Fujitsu Group further commits to engaging in appropriate remediation processes where it identifies that it has caused or directly contributed to adverse human rights impacts.

The Human Rights Statement has been prepared in 21 languages to ensure that it is embedded in the corporate culture of all Fujitsu group companies. Fujitsu has also set out the Fujitsu Guiding Principles of Respect for Human Rights in Employment (Guiding Principles), to ensure that respect for human rights regarding employment is firmly entrenched. It outlines our commitment to respecting human rights and equal employment opportunity, compliance with employment laws and regulations, prohibition of forces or child labour and striving to achieve and maintain healthy and safe work environments.

In its Guiding Principles, the Fujitsu Group commits to creating a culture in which employees respect the dignity and worth of individuals.

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The UN Global Compact: The 10 Principles

**Human Rights**
- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses

**Labour Standards**
- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

**Environment**
- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

**Anti-Corruption**
- Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.
Our Operations

Fujitsu Oceania is a leading service provider of business, information technology and communications solutions. We work with our customers throughout Australia and New Zealand to consult, design, build, operate and support business solutions.

We provide strategic consulting, as well as application and infrastructure solutions and services. We specialise in managed infrastructure services, Software as a Service (SaaS), development of Artificial Intelligence with clients, cloud services, architecture and consulting, desktop-related services, cyber security, application services, co-creation solutions, business and technological solutions, and data centre services. We also supply a range of products including PCs, workstations, monitors, point of sale devices, scanners and software.

In FY21, Fujitsu Australia acquired the data analytics specialist management consultancy companies Versor and the Australian-based Microsoft partner oobe as a part of Fujitsu’s expansion strategy and expanding customer base in multiple focus industries. In addition, Fujitsu Australia Software Technology (FAST), a Fujitsu company with expertise in specialist technology is also fully integrated with Fujitsu Australia.

FAST, oobe and Versor’s supply chains are now being integrated with Fujitsu Australia and aligning with Fujitsu’s governance framework to the highest standard. All acquired companies fall under Fujitsu’s governance framework and will follow the same modern slavery protocols and comply with Fujitsu’s promises to eradicate any Modern Slavery practices and manage human rights compliance.

Fujitsu Australia also outsources several of its functions to Global Delivery Centres (GDC), Weserv, Philippines and Fujitsu Consultancy India. Though GDCs are separate legal entities, Fujitsu Australia is implementing the same risk management framework for all affiliated companies.

Our goal of reducing the risk of modern slavery in Fujitsu’s operations and supply chain is overseen by a Modern Slavery Committee. The team comprises experts from Procurement, Legal & Compliance, Business Operations (Risk Management) and Office of Purpose.
Our Supply Chain

In FY21, Fujitsu Oceania transacted with over 1300 suppliers globally with a total annual spend $540M AUD. More than 90% of our spend was with suppliers located in Australia and New Zealand.

Our suppliers are classified into different tiers to determine suitable candidates for strategic relationships and apply the supplier management process. Supplier segmentation is a systematic way of prioritising our suppliers based on the types of products and services sourced, how much we spend with them and how critical they are to our business.

To support our operations and business, we engage with suppliers across a wide and diverse range of industries. Our suppliers are categorized as follows:

1. Hardware – this includes computer hardware and IT equipment purchased for resale or to assist Fujitsu Oceania with providing IT services to its customers. This hardware are predominantly purchased from Japan, Germany, China, USA.
2. Software – this includes software that is purchased for reselling or licensed to assist the business with the IT services Fujitsu Oceania provides to its customers. Software is predominantly purchased from Japan, Europe, USA, Australia and New Zealand.
3. IT Services – other than Hardware and Software suppliers, IT service suppliers are engaged to support Fujitsu Oceania in delivering business process, application, and infrastructure services to our customers during IT design, build, and run phases. IT service suppliers are predominantly sourced within Australia and New Zealand.
5. Corporate Services – to support the running of the Fujitsu Oceania business, including travel, accommodation, telecommunication, human resources and legal services. Predominantly sourced and engaged within Australia and New Zealand.
6. IT Contractors – specialist contractors to assist the business with the IT services Fujitsu Oceania provides to its customers. Predominantly purchased from Australia and New Zealand.
7. Professional Services – this includes all advisory services provided to Fujitsu or its customers. Predominantly purchased from Australia and New Zealand.
Our Supply Chain

- Australia and New Zealand: 91%
- Northern America: 4%
- UK and Ireland: 2%
- Europe (exc UK and Ireland): 2%
- Asia: 1%
Fujitsu Procurement Framework

Procurement Policies
Fujitsu Oceania is committed to the highest ethical, environmental, safety and quality standards within our business and in how we engage with our suppliers.

Fujitsu Oceania procures products and services based on the following procurement policies:

- Fujitsu Oceania Procurement Policy
- Fujitsu Global Procurement Policy
- Fujitsu Global CSR Supply Chain Guideline
- Fujitsu Global Green Procurement Policy
- Fujitsu Responsible Minerals Procurement
- Fujitsu Oceania Sustainability Policies

Fujitsu Oceania conducts business in a manner that is consistent with these policies and guidelines and requires the same level of compliance and behaviour from all suppliers subject to the applicable laws, rules and regulations of the countries where the business is carried out.
Fujitsu Procurement Framework

The Fujitsu Supplier Code of Conduct for Corporate Social Responsibility sets out the seven principles that all its suppliers must comply with. This Code of Conduct aims to ensure that all businesses that make up our supply chain understand and comply with our policies, principles, commitments, and targets for operating as a leading socially responsible business. The seven principles are:

- **Human Rights, Labour, Health and Safety**
  We respect individuals’ human rights, does not unfairly discriminate, provide a secure and healthy work environment, do not use child or forced labour, and respect the rights to freedom of association.

- **Diversity & Inclusion**
  We are committed to encouraging diversity in the workplace and the provision of a work environment that is free from discrimination and promotes equal opportunity for all.

- **Global Environment**
  We promote the establishment and implementation of environmental management systems.

- **Fair Trade and Corporate Ethics**
  We promote fair and free competition, proper handling of confidential information, respect intellectual property, prohibit corruption, including bribery and extortion, and ensure the responsible sourcing of minerals.

- **Compliance with Laws and Regulations**
  We comply with applicable laws, regulations and accepted social practices governing our local and global businesses and require the same of our suppliers.

- **Assurance of Safety and Quality of Products and Services**
  We maintain high standards of safety and quality in our products and services.

- **Information Security**
  We maintain and promote information security in order to properly protect our own information and information systems and those of third parties.
In 2017, the Fujitsu Group became a member of the Responsible Business Alliance (RBA), a coalition of organisations dedicated to advancing corporate social responsibility (CSR). Fujitsu Group’s objective is to strengthen CSR initiatives in our supply chain within the RBA framework. The RBA Code of Conduct has been adopted as the Group’s CSR Procurement Guideline. We expect our suppliers to support the Fujitsu Group CSR Procurement Guideline and conduct their worldwide operations socially and environmentally responsibly.

Fujitsu has a Fujitsu Group Policy on Responsible Minerals Sourcing, which sets out Fujitsu Group’s commitment to not procuring high-risk minerals (tantalum, tin, gold, tungsten and cobalt) from any known conflict sources. Fujitsu expects all its suppliers to adhere to these same standards. Fujitsu Limited’s Responsible Business Committee, chaired by the company’s President, performs due diligence investigations on high-risk minerals in our supply chain to ensure transparency for our customers and stakeholders.
Risks of Modern Slavery Practices in operations and supply chain

Fujitsu Oceania recognises several risks that can occur in its operations in different categories including: Health, Safety and Welfare, Legal and Regulatory, Operational and Financial domains to mitigate the modern slavery risk from all aspects.

As an Information Technology service provider with a predominately professional services workforce, we consider the risk of modern slavery within our direct business operations to be low. However, we understand that Fujitsu Australia may be directly or indirectly exposed to modern slavery risk because of our activities in general, mainly through our supply chain.

The modern slavery risk areas which may be present in our operations include the supply chains into our GDCs. The GDCs are not entities owned by us but are part of the Fujitsu Group.

We have outsourced several activities to the GDCs, including support and reporting functions. As the GDCs are separate legal entities, we have service agreements in place with them to mitigate risk exposure.

The more significant potential modern slavery risks areas which we may have in our supply chain relate to product and service risk and geographic risk.

Product and service risks may exist when goods are purchased from suppliers who utilise forced labour or products that contain materials that were not responsibly sourced. Geographic risk may exist where our suppliers have operations or have sourced material from areas where international organisations or non-governmental organisations have documented a high prevalence of modern slavery.
Assessing and addressing risks identified in our supply chain

Fujitsu Oceania has pre-emptive and protective measures for identifying, assessing, and escalating risk events to ensure the company has effective compliance procedures and prioritises addressing risk issues, ensuring appropriate reporting for the same. All supply chain risks are recorded and managed in the central Procurement & Operations Risk register to be reviewed by the Operations Management and Head of Procurement. All qualifying risks are then reported to the Risk Management Committee.

Fujitsu Australia follows a two-tiered strategy to analyse and mitigate modern slavery threats in our supply chain.

The first level requires the evaluation of all new suppliers prior to their acceptance as a supplier to Fujitsu Oceania. Fujitsu Oceania has a Third-Party Due Diligence (3PDD) procedure, which is a Fujitsu-built web-based platform with multiple levels of approval in analysing and signing off on a potential supplier. As part of the 3PDD procedure, the potential supplier must complete a questionnaire that includes questions meant to identify potential compliance risks, such as modern slavery issues. Fujitsu Oceania can engage a supplier if the 3PDD procedure is completed and the potential supplier passes the mandatory minimum requirements. Further, as a part of the Supplier onboarding process, we have embedded MS review process as a part of the Supplier Management Framework to mitigate Modern Slavery risk management. The SAP Ariba system was further developed to monitor all suppliers and manage ongoing activities with effective relationship management with all vendors.

The second level requires all suppliers to sign an agreement with Fujitsu Australia or Fujitsu New Zealand. The Supplier Agreements include a provision that all new suppliers comply with the Act and refrain from engaging in any activity, practise, or conduct that would constitute modern slavery under the Act. Fujitsu supplier contracts also provide Fujitsu the right to conduct onsite audits and terminate the agreement based on non-compliance with the Act. As part of the on-boarding process, suppliers agree to accept Fujitsu’s Supplier Code of Conduct for Corporate Social Responsibility.
Fujitsu has a supplier management framework in place to continuously monitor suppliers throughout the duration of their contractual relationship. In FY21, Fujitsu Australia carried out planned activities from the previous financial year to assess and mitigate risk in our supply chain. Continuing on our initiative last year, we sent out an updated detailed due diligence Modern Slavery Questionnaire to all in-scope suppliers (i.e. suppliers with a spend greater than $20,000 in FY21, excluding charities and government agencies) and followed up with suppliers who already completed the questionnaire last year for updates to assess the state of Modern Slavery management processes in the suppliers’ organisation. The following topics were included in the questionnaire, along with new questions about conflict minerals to assess potential risks:

- Compliance of each supplier with the Modern Slavery Act and what kind of Modern Slavery Awareness training each supplier provides to their workforce. A copy of the Fujitsu’s External Training pack was also shared with the suppliers for reference in developing their frameworks.
- Whether the supplier performs any type of due diligence when engaging with a new supplier that considers the potential presence of all forms of modern slavery, including human trafficking, slavery and forced labour.
- Whether the supplier has implemented any management systems or controls to assess their suppliers regularly to ensure there is no form of modern slavery present in their supply chain.
- Whether each supplier has a Conflict Minerals policy on Responsible Minerals Sourcing, as well as the composition of workers and safety measures in place when working with these high-risk minerals.
- Whether the supplier has an internal whistleblower tool for reporting modern slavery issues.

Over 95% of in-scope suppliers completed and returned the Modern Slavery Questionnaire, which enabled us to analyse our suppliers thoroughly. We could identify and assess actual and potential modern slavery risks in our supply chain from the collated responses.

We found that all critical and major suppliers met the requirements needed to comply with the Act. As part of our continuous improvement focus, we continue to work with all suppliers to assist them in complying with the Act and further risk management initiatives to reduce our supply chain’s exposure to modern slavery risk.
By analysing Fujitsu Oceania’s supplier profile database, a mapping exercise was conducted to locate suppliers in countries at higher risk of forced labour using the Transparency International’s Corruption Perceptions Index. This exercise identified that a vast majority of Fujitsu Oceania’s suppliers are located in very low risk areas, and over 96% of FY21 spending is with countries indexed in the lowest risk category.

We recognise that the manufacturing industry is high risk for modern slavery and appreciate that our business has suppliers in this category. However, using this index, we discovered that our manufacturing suppliers are not located in high-risk areas.

We used, and continue to use, this intelligence to minimise the risk of modern slavery in our supply chain. We have leveraged, and will continue to leverage, our membership with RBA to develop our approach to Modern Slavery.

We continue to undertake several audits via our global sourcing team, which include key labour practices and continue to review how we can effectively use these audits to mitigate any risk identified. We continually review and improve the process in line with industry practices. Where any issues are found, an action plan is formulated and agreed. Since the introduction of the Act, to mitigate modern slavery risks in Fujitsu Oceania’s operations, we have changed our Recruitment and Procurement policies to:

- ensure we comply with the Act,
- entrench Human Rights in our procurement and acquisition processes, and
- work with the supplier and put a remediation process in place where we identify a suspected situation of modern slavery in our supply chain.

Fujitsu encourages a culture of openness in which anyone can raise concerns about our business. We have a Whistleblower Policy which allows current or former employees and third parties to anonymously report concerns to certain senior people in Fujitsu Australia, or by phone or online to Fujitsu Alert. Any concerns about modern slavery in our operations or supply chain can also be reported via the process outlined in the Whistleblower Policy. Any whistleblower who makes an eligible disclosure (e.g. where the whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs in Fujitsu Australia) will be protected from any detrimental acts or omissions, including victimisation.

Our whistleblowing program can be found [here](#).
How Fujitsu Australia will assess the effectiveness of these actions

As described below, we have established a governance process to regularly review actions and steps taken to track our ability to meet our key goals.

We have implemented a Supplier Management Framework to identify, assess, mitigate, and monitor potential risk areas of modern slavery, including human trafficking. We are continuing to focus our supply chain risk assessment on high-risk suppliers across our Oceania operations. We have worked with SAP Ariba and implemented a new source-to-pay system which has streamlined the process for assessing and monitoring supplier risk, including modern slavery.

To evaluate the Modern Slavery Questionnaire, we conducted a qualitative assessment on all employment of labour and conflict minerals questions to assess any potential modern slavery risks in their supply chain practices.

We have also undertaken a gap analysis of our current policies and practices against the requirements of the Act and amended where necessary by adhering to the organisation risk appetite statement as evaluated by the Head of Risk Management. This ensures that the analysis only amounts to the acceptable level of risk Fujitsu is willing to retain to achieve its objectives.

Fujitsu Oceania Executive Management ensures that resources are available for effective implementation and maintenance of risk management procedures consistent with the policy statement. This includes human, equipment, materials, buildings, utilities, support services, measuring devices, and financial resources.

This Risk Management Framework has developed policies under the guidance of the Risk Management Committee, which mitigate the potential risks and develop mechanisms to foresee the potential damages ahead of time and build Business Continuity measures around it.
We understand that COVID-19 may have increased the risk of modern slavery and other forms of exploitation in parts of our operations and supply chains, as there has been an increase in the vulnerability of workers in the COVID-19 climate generally. In our operations, we are working hard to protect our workers and with our suppliers to ensure that no modern slavery practices are taking place within the organisation and third-party suppliers.

Fujitsu Oceania's Procurement function has worked with and gained assurance of business continuity from our supply chain in the current COVID-19 environment. Fujitsu Oceania has communicated with its suppliers about COVID-19 risks, and good progress is being made in mitigating the issues identified. As part of our supply chain mitigation strategy, measures are being taken to provide for a more responsive engagement of suppliers, improve management of supply lead times and allow for fast tracking of urgent goods and services.
As part of Fujitsu Oceania’s response to the COVID-19 pandemic, Procurement has continued to implement COVID-19 related risk mitigation activities across Fujitsu Oceania to protect and support workers in our supply chains, including:

• Expanding remote working capacity and capability in the interests of caring for our employees.
• Mitigating risks to service delivery by reducing the spread of the virus, all personnel who can perform their roles remotely were encouraged to do so in consultation with management.
• Issuing supplier business impact letters to our major and critical suppliers at the start of COVID-19 to gauge any potential impacts of the pandemic to their usual business activities. This helped to maintain supplier relationships and encourage open communication about the risks associated with the pandemic. All responses were analysed and due diligence was carried out to minimise the identified business risks.
• Prioritising the use of conferencing technologies to address communications needs. Implementing appropriate applications and measures to limit site access to enable physical distancing and support contact tracing where required, including using QR check-in codes.
• Implementing controlled return to work measures, where appropriate, which aligned with relevant government advice.
• Expediting supplier contracting process while still assessing new suppliers using 3PDD – short form supplier contracts, which still contain modern slavery provisions, aiming to reduce legal/financial exposure and speed up the contract execution process with suppliers were prepared.
• Extending orders over time to help ensure ongoing cash flow to support indigenous and minority suppliers.
• Asking suppliers what they are doing to protect the health and safety of their workers from COVID-19, such as providing workers with protective equipment.
• Developing and updating our Business Continuity plans in accordance with our global supply chain, with contingency plans in place to mitigate disruptions and minimise their impact on product availability and lead times.
• Developing a responsive engagement strategy as a part of supply chain mitigation practices and expanding on measures to support small/medium and indigenous suppliers throughout this challenging period. We have processes to expedite urgent payments and reduce the time for payment for smaller businesses.

We expect that by implementing the risk mitigation procedures outlined in this section, we will continue to work closely with our suppliers and assist them in addressing any impact COVID-19 may have on their operations regarding modern slavery risk.
Key Milestones from last year

Between 1 April 2021 to 31 March 2022 (FY21), we:

- Developed the standard approach and escalation mechanism to manage and evaluate human rights risks in our supply chain.
- Investigated and assessed the presence of conflict minerals in our supply chains.
- Carried out audits of Fujitsu GDCs to ensure relevant policies, procedures, and training are in place.
- Analysed and developed an industry risk index based on specific industries and their vulnerability to modern slavery.
- Further developed the digital procurement system and embedded the Modern Slavery review process as part of the Supplier Management framework.
- Investigated and audited selected Tier 2 suppliers that source products or material from high-risk countries using the Transparency International Corruption Perception Index.
- Developed an external training pack to increase suppliers’ awareness of potential modern slavery risks and red flags.

<table>
<thead>
<tr>
<th>Supplier categories</th>
<th>Industry Risk</th>
<th>Product Risk (Conflict Minerals)</th>
<th>Labour Risk (Services)</th>
<th>Geographic Risk (Fujitsu Supplier Pool)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hardware</td>
<td>High</td>
<td>High</td>
<td>High</td>
<td>High</td>
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<tr>
<td>Computer &amp; IT Equipment</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Software</td>
<td>Low</td>
<td>—</td>
<td>Low</td>
<td>Medium</td>
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<tr>
<td>Program Licenses</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>IT Services</td>
<td>Medium</td>
<td>—</td>
<td>Medium</td>
<td>Low</td>
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<tr>
<td>Process, Application, Infrastructure Services</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Medium</td>
<td>Low</td>
<td>High</td>
<td>Low</td>
<td>Low</td>
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<tr>
<td>Facilities &amp; Property</td>
<td>Medium</td>
<td>Low</td>
<td>Medium</td>
<td>Low</td>
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<tr>
<td>FM, Security, Maintenance</td>
<td></td>
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<tr>
<td>Corporate Services</td>
<td>Low</td>
<td>Low</td>
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<td>Low</td>
</tr>
<tr>
<td>Travel &amp; Telco, HR, Legal</td>
<td>(Medium for Telco)</td>
<td>(High for Telco)</td>
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<tr>
<td>IT Contractors</td>
<td>Low</td>
<td>—</td>
<td>Low</td>
<td>Low</td>
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<tr>
<td>Specialist Contractors</td>
<td></td>
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<tr>
<td>Professional Services</td>
<td>Low</td>
<td>—</td>
<td>Low</td>
<td>Low</td>
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<tr>
<td>Advisory</td>
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</table>
Between 1 April 2022 and 31 March 2023 (FY2022), we will:

- Continuously work with suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu’s Supplier Management Framework and risk management activities. Critical and major suppliers will be reviewed half-yearly, and minor suppliers will be reviewed annually.
- Embed the supplier performance & risk management framework to all Fujitsu Australia affiliate companies, including Fujitsu GDCs and newly acquired entities.
- Extend the scope of the supply chain assurance program to include any remaining ‘un-assessed’ supplier base.
- Audit suppliers who indicate they source potential conflict minerals to ensure a conflict minerals policy is in place.
- Continue to embed modern slavery clauses in our agreements and precedent contracts.
- Fully integrate all Fujitsu Australia's subsidiaries with its procurement systems and processes by collectively finalising a procurement strategy, defining short/long-term objectives and deliverables. Include all subsidiaries in the FY22 assessment.

Between 1 April 2023 and 31 March 2024 (FY2023), we will:

- Continuously work with all suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu’s Supplier Management Framework and risk management activities.
- Introduce Fujitsu Ethical Sourcing Program. Mandate Human Rights / Modern Slavery risk assessment as part of the selection criteria in the end-to-end Procurement cycle.
- Develop a dashboard to increase the transparency of human rights risks across our supply chain.
- Spot audit 30 suppliers to ensure compliance i.e., requesting specific documentation, policies etc.
- Conduct collaboration sessions with suppliers with offshore operations or subcontracting using migrant labour.
- Conduct a Tier 2 supply chain analysis for selected suppliers to ensure compliance with the Act and assess any modern slavery risks.
- Develop and implement the Fujitsu Oceania Environmental, Social and Governance framework.

Between 1 April 2024 and 31 March 2025 (FY2024), we will:

- Broaden stakeholder engagement across our controlled entities, other organisations, and civil society, collaborating with Fujitsu’s major customers to promote the best practice.
- Encourage Fujitsu suppliers to mandate modern slavery requirements in suppliers' internal procurement process.
- Review and uplift our human rights-related policies, where required.
- Review and enhance our approach to complaints and grievance mechanisms for our operations and within our supply chain.
- Improve Fujitsu online tools for the employee by enhancing both the usability and the information available.

Looking Forward

Our 3-year plan