

Modern Slavery Statement

Fujitsu Australia Limited

Fujitsu acknowledges Aboriginal and Torres Strait Islander peoples as the First Nations people 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.

Modern Slavery Statement

For the Reporting Period 1 April 2020 – 31 March 2021 (FY2020)

Reporting Entity

This is the second 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 at 31 March 2021, Fujitsu Limited and its 364 consolidated subsidiaries and 20 affiliates throughout the world, including Fujitsu Australia (Fujitsu Group), employed approximately 126,000 people who helped our customers in more than 100 countries. Fujitsu Limited reported consolidated revenues of 3.6 trillion yen (US\$34 billion) for the fiscal year ended March 31, 2021.

Fujitsu Australia is the primary trading entity of the Fujitsu Group operating in Australia. As at 31 March 2021, Fujitsu Australia had a wholly owned subsidiary, Fujitsu New Zealand Limited (Fujitsu New Zealand), which operates in New Zealand. Fujitsu Australia and Fujitsu New Zealand (together Fujitsu Oceania) have 30 premises across Australia and New Zealand, including 15 offices, 8 warehouses, and 7 data centres.

Fujitsu Oceania reported consolidated revenues of more than AU\$970m for the fiscal year ended 31 March 2021. The Fujitsu Group Integrated Report for the year-end 31 March 2021 can be found [here](#). As at that date, Fujitsu Australia had 2,201 employees and Fujitsu New Zealand had 474 employees.

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'.

Our Purpose

The Fujitsu Group's purpose is to make the world more sustainable by building trust in society through innovation. Our purpose represents why all Fujitsu people in the world work together every day. This is the core of the Fujitsu Way.

Our Values

In order to realise the purpose, 'Our Values' indicate a critical action cycle consisting of 'Aspiration', 'Trust', and 'Empathy'.

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

- Honour 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

The [Fujitsu Way Code of Conduct Global Business Standards](#) defines our commitment to ethical business practices and legal compliance. All Fujitsu employees are required to comply with the Fujitsu Way Code of Conduct Global Business Standards in all countries where we operate.

The Fujitsu Way contains a Code of Conduct, which outlines the fundamental principles that all Fujitsu Group employees should follow, as shown on the next page.

Our fundamental principles are:

- 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 organisation for personal gain.

Each principle is supported with regional policies. For example, Fujitsu Oceania has policies that cover antitrust and competition, recruitment, conflicts of interest, supply chain, inappropriate workplace behaviour (such as discrimination and bullying) and whistleblowing. These are reviewed annually to ensure they 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. The purpose of the Global Compliance Training includes reinforcing Fujitsu's Code of Conduct and Global Business Standards.



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 organisation for personal gain.





Fujitsu Group Human Rights Statement

Globally, the Fujitsu Group has a number of 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 continue to work to embed this concept as 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 Organisation's Declaration on Fundamental Principles and Rights at Work. The Human Rights Statement commits the 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, with the aim of embedding it in the corporate culture of all Fujitsu Group companies. Fujitsu has also published its Fujitsu Guiding Principles of Respect for Human Rights in Employment (Guiding Principles), which commits Fujitsu to striving to foster respect for human rights in employment practices. It outlines our commitment to respecting human rights and equal employment opportunity, compliance with employment laws and regulations, prohibition of forced 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. The Guiding Principles fall into four key areas: equal employment opportunities and respect for human rights; compliance with employment laws and regulations; prohibition of forced labour/child labour; and work environment.

Fujitsu's approach to Human Rights can be found [here](#).

Fujitsu Procurement Policies

Fujitsu Oceania aims to maintain the highest ethical, environmental, safety and quality standards within our business and in how we engage with our suppliers.

To that end, Fujitsu Oceania procures products and services based on the following procurement policies:

1. [Fujitsu Oceania Procurement Policy](#)
2. [Fujitsu Global Procurement Policy](#)
3. [Fujitsu Global CSR Supply Chain Guideline \(RBA Code of Conduct\)](#)
4. [Fujitsu Global Green Procurement Policy](#)
5. [Fujitsu Responsible Minerals Procurement](#)
6. [Fujitsu Oceania Sustainability Policy](#)

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.

The [Fujitsu Supplier Code of Conduct for Corporate Social Responsibility](#) sets out the seven principles with which it requires all its suppliers to comply. The purpose of this Code of Conduct is to align all businesses that make up our supply chain 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, do 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 and 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 avoid conflict 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.
- 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.

Fujitsu requests cooperation from our suppliers to act in accordance with our social responsibilities in the supply chain.



Our Operations

Fujitsu Oceania is a leading service provider of business, information technology and communications solutions. Throughout Australia and New Zealand, we work with our customers 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 (AI) 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 servers, PCs, workstations, monitors, point of sale devices, scanners and software.

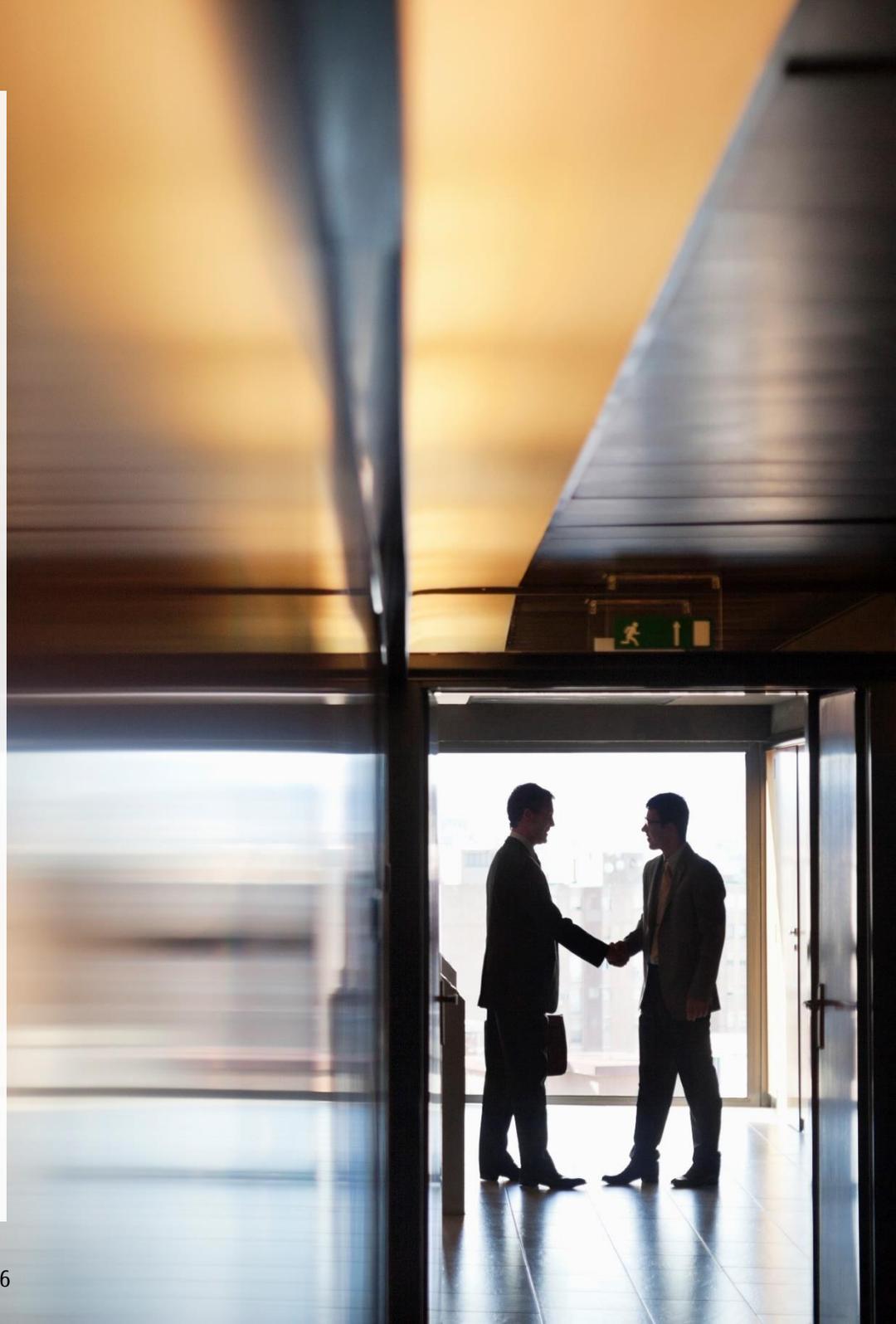
Fujitsu Oceania's business operational framework includes the divisions listed below:

- Customer Industry Engagement
- Infrastructure Solutions
- Service Delivery and Portfolios
- Strategic Communications and Government Relations
- Strategic Marketing
- Finance (includes Procurement)
- Business Operations
- Office of Purpose
- People & Culture
- Legal & Compliance
- Digital Systems Platform Unit
- Japan Liaison and Strategy.

Each division is headed up by an Executive Leadership Team (ELT) member, under the leadership of the Fujitsu Oceania Chief Executive Officer. Each ELT member is responsible for the day-to-day operations of their business unit including compliance and risk management. Our commitment to corporate social responsibility and environmental sustainability (which includes our goal of reducing the risk of modern slavery in Fujitsu's operations and supply chains) is overseen by the divisions of Procurement, Legal & Compliance and Office of Purpose.

Fujitsu Oceania also outsources several of its functions to companies which are part of the Fujitsu Group largely in the Philippines and in India, but also in other countries.

Fujitsu Australia has a Modern Slavery Committee that works to allow the organisation to meet its compliance and reporting requirements under the Act. The Committee is made up of Procurement, Legal & Compliance, Risk and Office of Purpose and it reports to the Head of Procurement and the Vice President of Legal & Compliance in Fujitsu Oceania.



Our Supply Chain

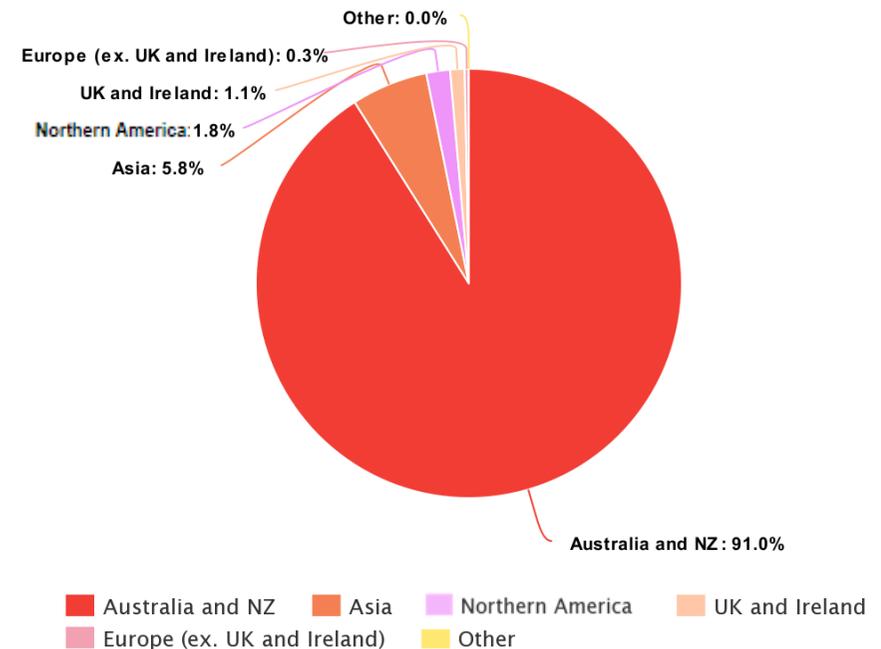
In FY2020, Fujitsu Oceania transacted with over 1300 suppliers globally, with more than 90% of our spend (~\$550M AUD) with suppliers located in Australia and New Zealand.

Our suppliers are classified into different tiers for the purpose of determining suitable candidates for strategic relationships and the application of 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.

Critical Suppliers	Major Suppliers	Minor Suppliers
<ul style="list-style-type: none"> ■ Small group of highest spend value vendors ■ Enterprise/Executive level Sponsor ■ Invest in partnership initiatives ■ Provide critical Hardware/Operational services to Fujitsu 	<ul style="list-style-type: none"> ■ Commodity type with large business volume ■ Spend is readily transferable ■ Consider leverage opportunities ■ Provide Hardware/Operational services to Fujitsu 	<ul style="list-style-type: none"> ■ Provide low risk impact product or services to Fujitsu ■ Ad-hoc scorecard assessments and relationship reviews

In order to support our operations and business, we engage with suppliers across a wide and diverse range of industries. Our suppliers can be broadly divided into the following categories of services and products:

1. Hardware – this includes computer hardware and IT equipment that is purchased for resale or to assist Fujitsu Oceania with the provision of IT services provided to its customers. These are predominantly purchased from Japan, Germany, China, and the USA.
2. Software – this includes software that is purchased for resale or licensed to assist the business with the IT services Fujitsu Oceania provides to its customers. These are 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. These are predominantly purchased from Australia and New Zealand.
4. Facilities and Property – cleaning, security, facilities management, maintenance & repair, and waste management. These are predominantly purchased from 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. These are predominantly purchased from Australia and New Zealand.
6. IT Contractors – specialist contractors to assist the business with the IT services Fujitsu Oceania provides to its customers. These are predominantly purchased from Australia and New Zealand.
7. Professional Services – this includes all advisory services provided to Fujitsu or its customers. These are predominantly purchased from Australia and New Zealand.



A hand holding a glowing lightbulb with a network overlay. The lightbulb is illuminated from within, casting a warm orange glow. A white network of dots and lines is superimposed over the lightbulb and extends downwards. The background is a blurred, light-colored surface.

Key Milestones in FY2020

Between 1 April 2020 and 31 March 2021 (FY2020), we:

- Finalised the Fujitsu Oceania Supplier Framework which consists of Supplier Management Policy, Supplier Management Process and Supplier Risk Management systems and processes. This framework was rolled out to Fujitsu Oceania in FY2020.
- Updated the Fujitsu Oceania Procurement policies and processes, including the Supplier Code of Conduct for Corporate Social Responsibility, which outlines expectations of suppliers to comply with the Act and commitment to put in place processes to identify and mitigate the risk of modern slavery practices in their supply chain.
- Conducted Modern Slavery training and awareness sessions to internal stakeholders who work with suppliers in FY2020 and offered external training to our major suppliers to improve their capability to identify potential modern slavery risks.
- Continuously monitored all suppliers - critical and major suppliers were reviewed half yearly and minor suppliers were reviewed annually.
- Continued to work with the suppliers that required remediation actions. All suppliers that were identified as requiring remediation actions in FY2019 now have modern slavery policies and procedures in place.
- Received audit reports from Responsible Business Alliance for the two suppliers identified in FY2019 from which Fujitsu Group purchases a small amount of goods which may contain modern slavery risks. Audit reports have shown significant improvement in conformance since previous ratings and no risk was reported following the most recent audit.
- Spot audited 30 critical or major suppliers to ensure compliance with the Act. No major issues were found.
- Required Fujitsu's Global Delivery Centres (GDCs) in India and the Philippines to have policies, procedures, and training in place to ensure that they are compliant with the Act.
- Investigated the impact of the COVID-19 outbreak on our supply chain and communicated with our suppliers to mitigate the risk of modern slavery as a result of the pandemic.
- Engaged Dun & Bradstreet to conduct risk and financial assessment review for all our critical and major suppliers and put strategies in place to mitigate risk across our operations.

Risks of Modern Slavery Practices in operations and Supply Chain

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

The modern slavery risk areas which may be present in our operations include the supply chains into the GDCs. The GDCs are not entities owned by us but are part of the Fujitsu Group. We have outsourced a number of activities to the GDCs including support and reporting functions.

As the GDCs are separate legal entities, we have service agreements in place with them. Over the last financial year, the GDCs in India and the Philippines have updated their supplier contracts to include provisions that require suppliers to comply with human rights laws, updated their policies and carried out modern slavery training to their employees. To date our investigations have not discovered any instances of modern slavery in the supply chain of these businesses. We will perform ongoing reviews of GDC business practices, including third party contractors that support GDCs operations.

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 may utilise modern slavery, or when products are purchased that contain materials that were sourced using modern slavery. 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.

A man with glasses and a woman with curly hair are looking at a tablet together. The man is pointing at the screen while the woman smiles. They are in a modern office setting.

Actions taken by Fujitsu Australia to assess and address product and service risk and geographic risk

We identified in our first Modern Slavery Statement that Fujitsu Limited had informed us that it was aware of one potential product risk. This risk arose because Fujitsu Group purchases a small amount of goods from two suppliers based in China that may have a modern slavery risk.

The COVID-19 outbreak posed unique challenges to us in seeking to address this risk. We reached out to the Responsible Business Alliance (RBA), of which Fujitsu is a member, to assist us. We found:

- That both suppliers were also members of the RBA.
- As RBA members, the two suppliers had audits performed at their factories in China in 2019 and 2020. Both suppliers had completed an [RBA Validated Assessment Program Audit](#) carried out by independent third-party auditors specially trained in social and environmental auditing and the VAP protocols. The audit process includes on-site inspections, document review and worker and management interviews.
- The VAP audits found the main “major” non-conformance at the factories were working hours. It is our understanding that the suppliers are currently working to remedy any issues that were highlighted in the findings.

During FY2021 we will follow up with RBA to ensure that the suppliers have completed their corrective actions plans.

There were no additional products and service risks identified during FY2020.

Assessing and addressing risks identified in our supply chain

Fujitsu Oceania has a two-tiered strategy to analysing and mitigating modern slavery threats in our supply chain.

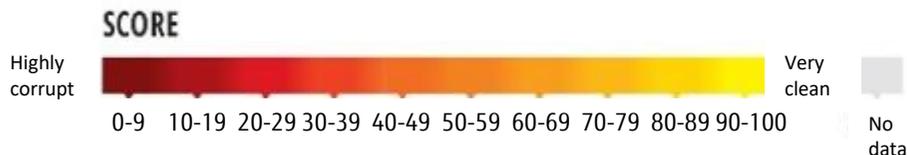
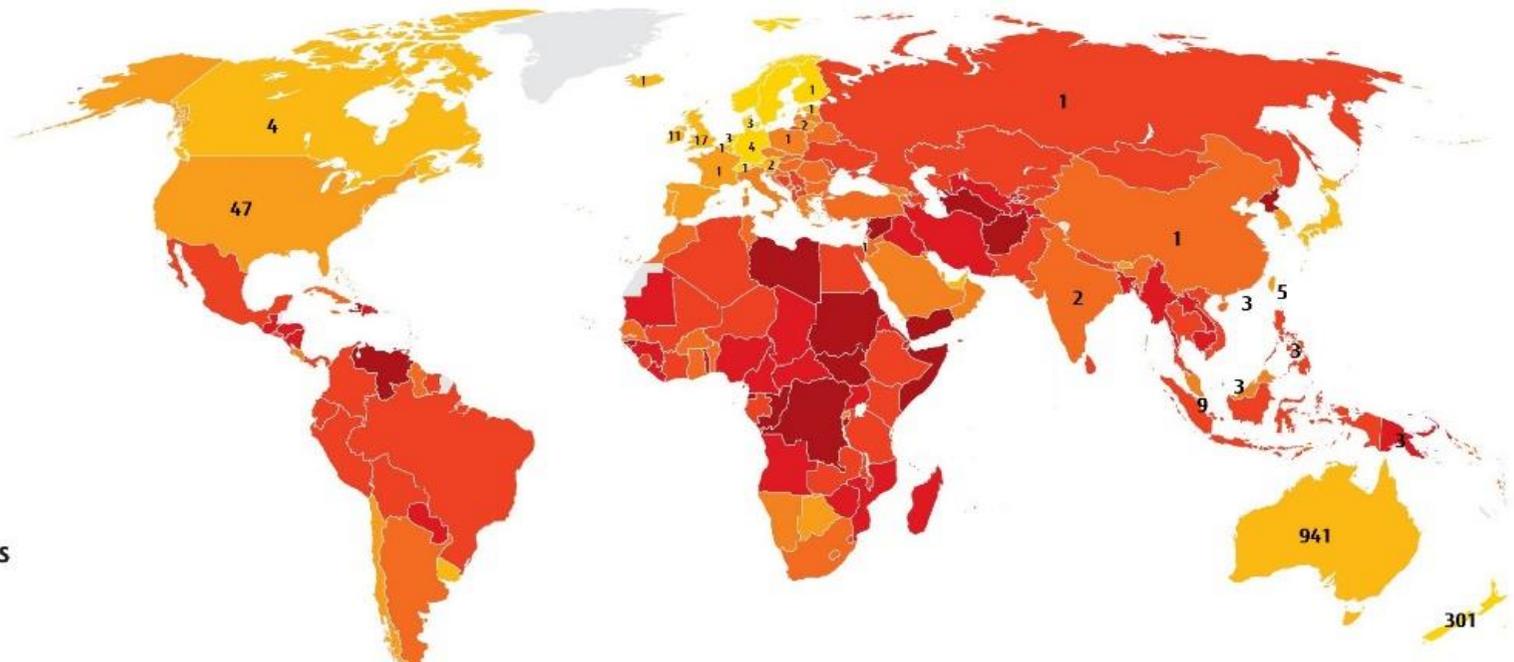
The first level requires the evaluation of all new suppliers prior to their acceptance as a supplier to Fujitsu Oceania. Fujitsu Oceania has a Third-Party Due Diligence (3PDD) procedure, which is a Fujitsu built web-based platform with multiple levels of approval in analysing and approving the engagement of a potential supplier. As part of the 3PDD procedure, the potential supplier must complete a questionnaire which includes a series of 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.

The second level requires all suppliers to then enter into an agreement with Fujitsu Australia or Fujitsu New Zealand. Fujitsu Oceania's standard Supplier Agreements include a provision that all new suppliers comply with the Act and refrain from engaging in any activity, practice, or conduct that would constitute modern slavery under the Act. Fujitsu Oceania's Supplier Agreements also provide Fujitsu the right to conduct onsite audits and terminate the agreement for 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.



CORRUPTION PERCEPTIONS INDEX 2020

The perceived levels of public sector corruption in 180 countries/territories around the world.



#cpi2020

www.transparency.org/cpi

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In FY2020, Fujitsu Australia took further steps to assess and mitigate risk in our supply chain. We sent a detailed due diligence Modern Slavery Questionnaire to all active in-scope suppliers (i.e. suppliers with a spend greater than \$20,000 in FY2020, excluding landlords, charities, government agencies and one-off suppliers).

The questionnaire covered questions including:

- how each supplier is complying with the Act
- what kinds of Modern Slavery Awareness training does each supplier provide to their workforce
- whether the supplier performs any type of due diligence when engaging with a new supplier that considers the potential presence of all forms 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 or other policy on Responsible Minerals Sourcing
- whether the supplier has a whistleblower tool for reporting modern slavery issues.

From the collated responses, we were able to identify and assess actual and potential modern slavery risks in our supply chain.

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 compliance 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 identify any suppliers located in countries at higher risk of forced labour using the Transparency International's Corruption Perceptions Index. This exercise identified that the vast majority of Fujitsu Oceania's suppliers are located in very low risk areas and over 95% of FY20 spend is with countries indexed in the lowest risk category. We have noted on the world map on page 11 where our suppliers are based.

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 direct hardware suppliers who have manufacturing exposure 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 a number of 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. Where any issues are found, an action plan is formulated and agreed. We continually review and improve the process in line with industry practices.

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
- where we identify a suspected situation of modern slavery in our supply chain, work with the supplier and put a remediation process in place.

How Fujitsu Australia will assess the effectiveness of these actions

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

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.

We have also undertaken a gap analysis of our current policies and practices against the requirements of the Act and amended where necessary.

We are 1 year into our 3-Year Plan which outlines our strategy to review and assess modern slavery risks in our supply chain and the effectiveness of our actions. This 3-Year Plan will be reviewed and amended each year depending upon our findings.



Looking forward | Our 3-Year Plan

Between 1 April 2021 and 31 March 2022 (FY2021), we will:

- Establish an Environmental, Social and Governance framework for Fujitsu Oceania.
- Continuously work with all active suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Investigate and assess whether there are conflict minerals in suppliers' supply chains and encourage them to have a conflict minerals policy.
- Delve deeper by investigating our Tier 2 suppliers. We will do this by auditing the suppliers that have stated in their questionnaire response that they may have sourced products or material from countries which were considered high risk using the Transparency International Corruption Perception Index.
- Continue to periodically audit the GDCs to ensure that they have policies, procedures, and training in place to ensure that they are compliant with the Act.
- Continuously monitor all suppliers - critical and major suppliers will be reviewed half yearly and minor suppliers will be reviewed annually.

Between 1 April 2022 and 31 March 2023 (FY2022), we will:

- Develop the Environmental, Social and Governance framework for Fujitsu Oceania.
- Continuously work with all active suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Conduct a Tier 2 supply chain analysis for all major suppliers to ensure compliance with the Act and assess any further modern slavery risk.
- Audit suppliers who indicate they source potential conflict minerals to ensure they have a conflict minerals policy in place.
- Require our GDCs to assess their supply chains to see if they have any modern slavery risks that need to be considered.
- Continuously monitor all suppliers - critical and major suppliers will be reviewed half yearly and minor suppliers will be reviewed annually.

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

- Continuously work with all active suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Conduct a Tier 2 supply chain analysis for all in-scope suppliers to ensure compliance with the Act and assess any further modern slavery risk.
- Continuously monitor all suppliers - critical and major suppliers will be reviewed half yearly and minor suppliers will be reviewed annually.
- Support the delivery of the Fujitsu Oceania Environmental, Social and Governance targets.



Consultation with entities Fujitsu Australia owns

Fujitsu New Zealand is a wholly owned subsidiary of Fujitsu Australia and operates in New Zealand. Fujitsu New Zealand is, in many ways, a part of Fujitsu Australia, as it operates in the same sector and has many shared suppliers as Fujitsu Australia. Fujitsu New Zealand has Fujitsu Australia assess all its potential suppliers by using the same 3PDD system, and the Head of Procurement oversees its suppliers. The Board of Fujitsu New Zealand have been consulted and have reviewed and signed off on this Modern Slavery Statement.

Responsible Business Alliance

In 2017, the Fujitsu Group became a member of the RBA, a coalition of organisations dedicated to advancing corporate social responsibility (CSR). Fujitsu Group's objective is to strengthen CSR initiatives in our supplier 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 in a socially and environmentally responsible manner.

Responsible Mineral Procurement

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 and expectation for its suppliers to adhere to the same standards. Fujitsu Limited's Responsible Business Committee, chaired by Fujitsu Limited's President, performs due diligence investigations on high-risk minerals in our supply chain to ensure transparency for our customers and stakeholders.

Whistleblower

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, which is independently monitored. 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 missions, including victimisation. Our whistleblowing program can be found [here](#).



Impact of COVID-19

We recognise 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 as well as working with our suppliers.

Fujitsu Oceania's Procurement function has worked with and gained assurance of continuity of business 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 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 seek to protect and support workers in our supply chains. Many of these activities were also reported on as part of Fujitsu Oceania's first Modern Slavery Statement:

- Supplier business impact letters were sent out to our critical and major suppliers in the first week of March 2020 requesting suppliers to advise whether they were currently experiencing any impact as a result of COVID-19. We did this to maintain supplier relationships and foster open communication about COVID-19 risks. Supplier responses were analysed and if any risks were highlighted, further due diligence was carried out to minimise our business risks.
- A 'COVID-19 Fujitsu supplier communication' was issued in May 2020 to all of our suppliers across Fujitsu Oceania, which included notifying our suppliers that Fujitsu Oceania business was operating as 'business as usual' and requesting that each supplier keep us updated on any potential supply disruptions that they may encounter, which would have an impact on Fujitsu Oceania or to our customers.
- 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.
- Expediting supplier urgent payments - process put in place to fast-track payments for all small suppliers and for any urgent goods and services that needed to be procured to minimise any operational business impact.
- Extending orders over time to help ensure ongoing cash-flow.
- Avoiding varying contracts unreasonably.
- 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.
- Freight lead time management – collaborative approach implemented with the global supply chain unit (Japan HQ) which assessed existing freight carrier's capacity and reviewed alternative providers to allow flexibility and coverage.

On a global level, the Fujitsu Group engaged Dun & Bradstreet's Procurement Analytics to carry out a Procurement Health Scan for Fujitsu Group in April 2020. This analysis provided a high-level overview of potential risks to our global supply chain including risks posed by COVID-19. As part of ongoing procurement activities, Fujitsu Oceania is continuing to engage with Dun & Bradstreet to analyse and manage these potential supply chain risks as countries emerge from the COVID-19 pandemic.

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 in terms of modern slavery risk.

We are pleased with the progress we have made in analysing, responding to, and implementing initiatives in our second Modern Slavery Statement. As our business under COVID-19 evolves, we are committed to continuous improvement and the removal of any modern slavery risks that exist in our supply chain.

The Board of Fujitsu Australia Limited have approved this Modern Slavery Statement on 23 August 2021.



Graeme Beardsell
Fujitsu Australia and New Zealand CEO

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