

Fujitsu acknowledges the Australian Aboriginal and Torres Strait Islander peoples of this nation. 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 2019 – 31 March 2020 (FY2019)

### Reporting Entity

This is the inaugural 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.

## Fujitsu Structure

Fujitsu Australia is a wholly owned subsidiary of Fujitsu Limited, a company incorporated and with its headquarters in Japan. Fujitsu Limited was founded 85 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 2020, Fujitsu Limited and its 391 consolidated subsidiaries and 25 affiliates throughout the world, including Fujitsu Australia (Fujitsu Group), employed approximately 130,000 people who help our customers in more than 100 countries.

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. Fujitsu Australia and Fujitsu New Zealand (together Fujitsu Oceania) have 41 premises across Australia and New Zealand, including 15 offices, 15 warehouses, 4 hubs and 7 data centres.

Fujitsu Oceania reported consolidated revenues of more than AU\$1bn for the fiscal year ended March 31, 2020. The Fujitsu Group Integrated Report for the year-end 31 March 2020 can be found <a href="here">here</a>. As at that date, Fujitsu Australia had 2,261 employees and Fujitsu New Zealand had 484 employees.



# Fujitsu Operations

Fujitsu Oceania is a full service provider of information technology and communications solutions, including in general strategic consulting, application and infrastructure solutions and services. Throughout Australia and New Zealand, we work with our customers to consult, design, build, operate and support business solutions.

The services Fujitsu Oceania provides include 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.

Fujitsu Oceania also supplies a range of products including PCs, workstations, monitors, point of sale devices, scanners and software.

Our business operating model comprises of the following divisions:

- Service Delivery
- Sales and Customer Service Management
- Portfolio and Alliances
- Strategy and Marketing
- Finance and Operations
- Human Resources
- Legal and Compliance

Each division, is headed up by an Executive Leadership Team member, under the leadership of the Chief Executive Officer. Each Executive is responsible for the day-to-day operations of their business unit including compliance and risk management within Fujitsu Oceania.

Fujitsu Oceania also outsources a number of its functions to companies which are part of the Fujitsu Group in the Philippines, India and other countries around the world.

#### Our Supply Chain

In FY2019, Fujitsu Oceania transacted with over 1000 suppliers globally, with more than 90% of our spend (~\$650) 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 how much we spend with them, and how critical they are to our business.

Critical Suppliers	Major Suppliers	Minor Suppliers
<ul> <li>Small group of highest spend value vendors</li> <li>Enterprise/Executive level Sponsor</li> <li>Invest in partnership initiatives</li> <li>Provide critical Hardware/ Operational services to Fujitsu</li> </ul>	<ul> <li>Commodity type with large business volume</li> <li>Spend is readily transferable</li> <li>Consider leverage opportunities</li> <li>Provide Hardware/Operational services to Fujitsu</li> </ul>	<ul> <li>Provide low risk impact product or services to Fujitsu</li> <li>Ad-hoc scorecard assessments and relationship reviews</li> </ul>

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. Predominantly purchased from Japan, Germany, China, USA;
- 2. **Software** this includes software that is purchased for resell or licensed to assist the business with the IT services Fujitsu Oceania provides to its customers. 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. Predominantly purchased from Australia and New Zealand;
- **4. Facilities and Property** cleaning, security, facilities management, maintenance, repair and operations, waste management. 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. 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. 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.







Following the enactment of the Act, Fujitsu Australia established a Modern Slavery Committee to ensure Fujitsu Australia meets its compliance obligations, as well as its reporting requirements, under the Act. The Committee members are from Supply Chain, Legal and Compliance, Risk and Responsible Business and reports to Head of Supply Chain and VP Legal and Compliance.

In order to assess and address the modern slavery risks in Fujitsu Australia's supply chain, our Supply Chain function (contained in our Finance & Operations division) carried out a thorough due diligence activity in relation to our entire supply chain over the Reporting Period, which is explained below.

Fujitsu Oceania currently has a 2 level approach to assessing its supply chain and then reporting in accordance with the Act. Firstly, Fujitsu Oceania has a Third Party Due Diligence process (3PDD) which equires new suppliers to be assessed before they are accepted as a supplier to Fujitsu Oceania. 3PDD is a Fujitsu built system platform and is a web-based solution where various levels of approval (including Supply Chain, and if required, Legal and Compliance) are involved in evaluating and signing off the potential supplier. The 3PDD process includes a questionnaire which the potential supplier is required to answer. The questionnaire includes a list of questions aimed at identifying potential compliance risks, such as modern slavery issues.

Once the 3PDD process has been completed and the potential supplier passes required minimum thresholds, a supplier can be engaged by Fujitsu Oceania. The supplier is then required to enter into 5 an agreement with Fujitsu Australia of Fujitsu New Zealand. Fujitsu Australia has amended the terms and conditions of the Supplier Agreements to include a requirement that all new suppliers will comply with the Act and will not engage in any activity, practice or conduct which would constitute modern slavery under the Act. Fujitsu supplier contracts also allow Fujitsu 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.





Since the introduction of the Act, Fujitsu Australia has taken further steps to assess and mitigate risk in our supply chain. These include the following:

First, Fujitsu Oceania Supply Chain undertook a thorough analysis of its supply chain with all suppliers categorised by risk profile based on the product and services provided to Fujitsu Australia. For the purposes of this first Modern Slavery Statement, in-scope suppliers were all suppliers with a spend of greater than \$100,000 in FY2019, excluding landlords, charities/government agencies, and one off suppliers. It is intended that these out of scope suppliers will be investigated in FY2021 (i.e. our third Modern Slavery Statement).

Second, Fujitsu Australia prepared a detailed due diligence Modern Slavery Questionnaire which was provided to all active in-scope suppliers for completion, covering questions including:

- how each supplier is complying with the Act;
- whether it undertakes any form of risk assessment when engaging with a new supplier / contractor that considers the potential risks of slavery;
- whether it has formal policies and procedures in place to address modern slavery; and
- a request for each supplier to list the countries that it sourced their products and materials from.

98% of in-scope suppliers completed and returned the Modern Slavery Questionnaire, which enabled us to undertake a thorough analysis of our suppliers. The questionnaires were sent out to the suppliers prior to the outbreak of COVID-19.

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

We found that 3 of our medium risk suppliers needed assistance to comply with the Act. All 3 suppliers had no policies or processes in place to deal with modern slavery.

We have undertaken the following remediation processes to assist these 3 suppliers:

- 1. Established clarity for those suppliers around Fujitsu Australia's legal compliance expectations regarding the Act:
- 2. Worked with those suppliers to establish and implement human rights/modern slavery policies and supplier
- 3. codes of conduct/ procurement policies; and
- 4. Promoted ethical business operations and ethical sourcing amongst those suppliers, including encouraging them to internally review their supply chain activities and confirm high risk countries where they were sourcing their products

We will continue to work with these 3 suppliers to assist them to comply with the Act.

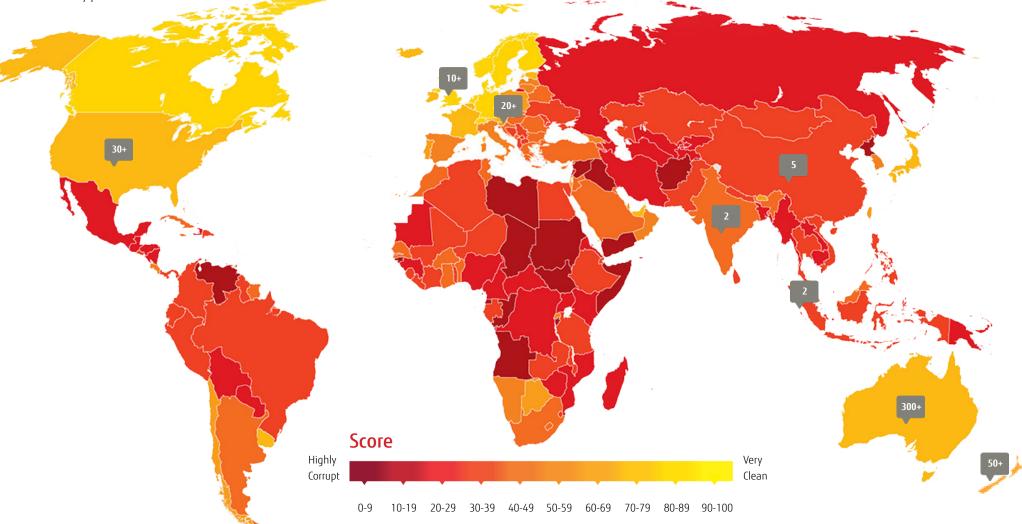
Fourth, from the collated responses, we were also able to conduct a mapping exercise to locate suppliers in countries at higher risk of forced labour using the Transparency International's Corruption Perceptions Index. This identified that the vast majority of Fujitsu Oceania's suppliers are located in very low risk areas. Over 95% of our total spend is with countries indexed in the lowest risk category. We have noted on the world map on p.7 where the in-scope suppliers are based.

We acknowledge 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 identified that our manufacturing suppliers are not based in higher 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.

Finally, since the introduction of the Act, we have as part of our mitigation strategy, also addressed modern slavery risks by:

- changing the terms and conditions of our supply agreements,
- changing our Recruitment and Supply Chain policies to:
  - ensure we comply with the Act,
  - entrench Human Rights in our procurement and acquisition processes, and
  - where we identify a suspected situation of modern slavery in our supply chain, work with the supplier and put a remediation process in place.





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 Risk & Performance 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 Fujitsu Australia's current policies and practices against the requirements of the Act and amended where necessary.

We have developed a 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 a rolling project, which will be reviewed and amended each year depending upon our findings.



#### Our 3-Year Plan

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

- Finalise and publish the Fujitsu Oceania Supplier Risk & Performance Framework by 30 August 2020. This framework will be rolled out to Fujitsu Oceania and be included in training sessions which will be held internally in FY2020;
- Carry out Modern Slavery training and awareness sessions to internal stakeholders who work with suppliers in FY2020 and offer external training sessions to our major suppliers in order to improve their capability to identify potential modern slavery risks;
- Continuously monitor all suppliers critical and major suppliers will be reviewed half yearly and minor suppliers will be reviewed annually;
- Continue to work with the 3 suppliers that required remediation actions and check each quarter how they are progressing with any actions they have put in place to address modern slavery risks;

Audit the 2 suppliers which Fujitsu Group purchased a small amount of goods from to determine whether they are using inappropriate labour practices that constitute modern slavery;

Spot audit 30 critical or major suppliers to ensure compliance with the Act;

Require our GDC's to have policies, procedures and training in place to ensure that they are compliant with the Act.

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

Send the Modern Slavery Questionnaire out to those suppliers with annual expenditure of less than \$100,000, as well as landlords and charities/government agencies, and such entities will be in-scope and included in our FY2021 Modern Slavery Statement;

Investigate and assess the presence of 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;

Audit our GDC's 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:

- Send another detailed Modern Slavery Questionnaire to all our suppliers;
- Request our GDC's 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.

The Modern Slavery Committee will meet quarterly to measure the effectiveness of our actions against the 3-Year Plan.

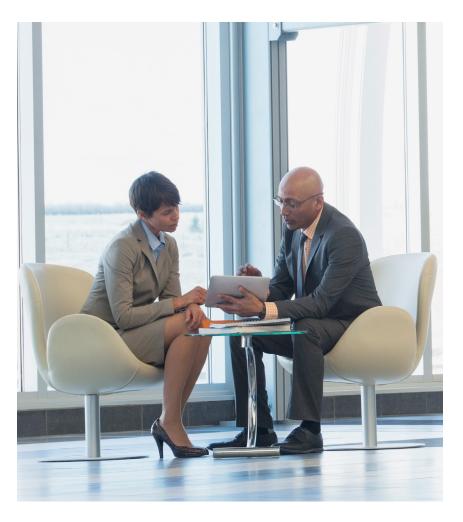
#### Our goals for FY2020 are:

- To have rolled out the Fujitsu Oceania Supplier Risk & Performance Framework.
- To carry out Modern Slavery training and awareness sessions to internal stakeholders who work with suppliers and offer external training sessions to our major suppliers.
- To continuously monitor all suppliers at least annually.
- To continue to work with the 3 suppliers that required remediation actions.
- To audit the 2 suppliers which Fujitsu Group found had used forced labour.
- To spot audit 30 critical or major suppliers to ensure compliance with the Act.
- To require our GDC's to ensure that they have policies, procedures and training in place compliant with the Act.



#### 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 of its potential suppliers by using the same 3PDD system, and the Head of Supply Chain oversees its suppliers. The Board of Fujitsu New Zealand have been consulted and have reviewed and signed off on this Modern Slavery Statement.



# Fujitsu Group Human Rights Statement

At a global level, the Fujitsu Group has a number of global human rights policies, processes and training programs in place and has stipulated that it will respect all aspects of Human Rights for our employees, our supply chain and for our customers.

In the <u>Fujitsu Group Human Rights Statement</u>, the Fujitsu Group is committed to respecting human rights of all stakeholders related to its business operations, products and services in accordance with its philosophy embodied in "<u>The Fujitsu Way</u>". 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.

In its <u>Guiding Principles</u> of <u>Respect for Human Rights in Employment</u> (**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 Group's business partners are made aware of the <u>Fujitsu Group Procurement Policy</u>, which includes provisions on the elimination of forced labour and child labour.

Fujitsu Group also has articulated in the Fujitsu Way Code of Conduct guidelines for each employee to comply with in conducting daily business operations. A principle which underpins the Fujitsu Group's corporate and individual activities is that "We respect human rights". The Fujitsu Group has publicly announced its 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 (ILO) "Declaration on Fundamental Principles and Rights at Work".

### Responsible Business Alliance

In 2017, the Fujitsu Group joined the RBA, which is a coalition of organisations promoting corporate social responsibility (**CSR**). Fujitsu Group's strategy is to further strengthen initiatives related to CSR in our supply chain through the framework of RBA. The Fujitsu Group has adopted the RBA Code of Conduct as its 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 Group 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. A Responsible Business Committee in Fujitsu Limited, chaired by the President of Fujitsu Limited, conducts due diligence investigations on high-risk minerals in our supply chain to promote transparency for our customers and stakeholders.

#### Whistleblower

Fujitsu Australia encourages a culture of openness where any one can raise concerns about our business. Fujitsu Australia has a Whistleblower Policy containing, among other things, information for 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 modern slavery concerns in our operations and supply chain are also able to be reported under the process set out in the Whistleblower Policy. Any whistleblower making 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.

#### 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 Supply Chain 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.

Some of the COVID-19 related risk mitigation activities which are underway across Fujitsu Oceania's supply chain to protect and support workers in our supply chains include:

- Supplier business impact letter 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 carriers capacity and reviewed alternative providers to allow flexibility and coverage.

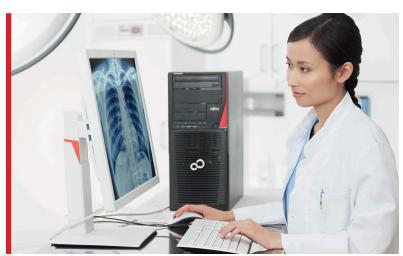
On a global level, Fujitsu Group engaged Dun & Bradstreet's Supply Chain Analytics to carry out a Supply Chain Health Scan for Fujitsu Group as of 4 April 2020. This provided a high-level overview of potential risks to our global supply chain including risks posed by COVID-19.

This report stated that in April 2020:

- 335 Tier 1 suppliers were in "lock down" cities;
- 292 Tier 1 suppliers with 15% or more Tier 2 suppliers were in "lock down" cities;
- out of the 521 global Tier 1 suppliers assessed, there was one 1 Tier1 "high risk" supplier;
- out of 153 Tier 1 suppliers linked to Tier 2 suppliers with high supplier elevation risk or compliance/business continuity risk, there were 2 Tier 1 suppliers with 50% or more "high risk" Tier 2 suppliers.

None of these 3 "high risk" suppliers identified above were suppliers to Fujitsu Australia. Although this report provided us with a level of comfort of our global supply chain as at April 2020, we realise that there may be real human rights and modern slavery issues as suppliers come out of lock down and continue business under COVID-19.

By carrying out the risk mitigation actions identified in this section above, we hope to work closely with our suppliers and assist them in addressing any impact COVID-19 may be having to their operations in relation to modern slavery risk. We have in the first instance put in place business continuity planning measures to assist our supply chain.



We are pleased with the progress we have made in assessing, addressing and setting up initiatives in our first Modern Slavery Statement. As business under COVID-19 continues to evolve, we are committed to continuous improvement and to eradicating any modern slavery risks as they arise from our supply chain.

The Board of Fujitsu Australia Limited have approved this Modern Slavery Statement on X July 2020.

Graeme Beardsell Fujitsu Australia and New Zealand CEO

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#### Fujitsu Australia and New Zealand

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