

Compliance

Ensuring thorough compliance in line with our code of conduct

Ensuring Thorough Compliance

Our code of conduct, as set forth in *The FUJITSU Way*, clearly states that we will comply with applicable laws and regulations. We have also established internal regulations to be adhered to, and we are taking measures to ensure awareness of and compliance with these regulations among our employees.



The FUJITSU Way has been printed on small cards and distributed to all Fujitsu Group employees. In this way, each employee can be reminded to refer to our core principles and standards when interacting with customers or business partners, or when facing doubts about day-to-day work judgments.

The FUJITSU Way Code of Conduct

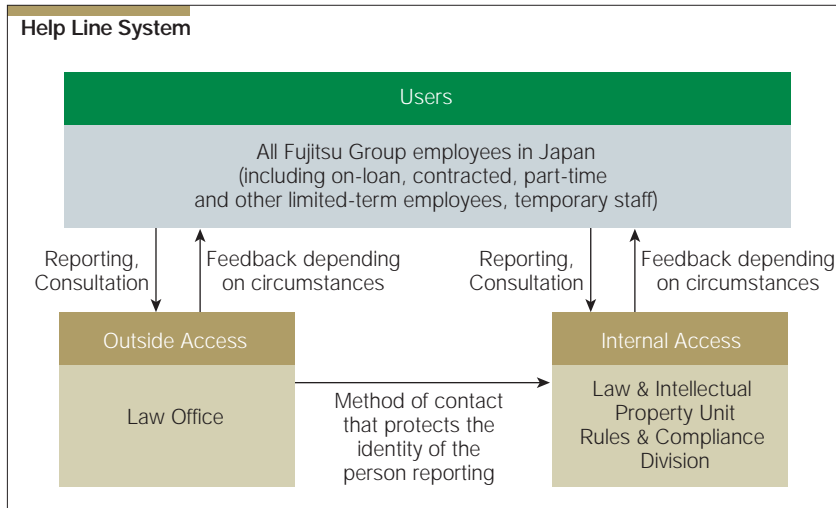
The FUJITSU Way code of conduct indicates basic principles, standards, and shared values concerning how Fujitsu Group employees are to conduct themselves. The code of conduct is made up of the six criteria listed at right.

Help Line System

In September 2004, we took a further step to promote compliance with the code of conduct, establishing an internal help line system in Japan.

The help line serves two purposes. It is a consultation resource for employees who, in the course of carrying out their job responsibilities, are unable to determine whether a particular action is potentially in violation of *The FUJITSU Way* or laws and regulations. It also serves as a line of reporting for employees when they are unable to go through normal management channels. The help line is available to all Group employees, including on-loan, contracted, part-time and other limited-term employees as well as temporary staff.

Such reporting and notification from employees not only represents an application of *The FUJITSU Way* and a means to ensure adherence to laws and regulations, it is also an opportunity to improve business activities and management. Consequently, the Fujitsu Group strictly forbids the discriminatory treatment of any employee due to such reporting. Moreover, to protect the identity of the person involved, great care is taken when handling reported information.



The FUJITSU Way Code of Conduct

Respect Human Rights

We will respect the rights of every individual. Human rights are not to be abused through sexual harassment or discrimination on the basis of race, religion, belief, sex, social status, family origin, handicap or sexual orientation. Such discrimination shall not be tolerated.

Comply with Laws and Regulations

We will adhere to all applicable laws and social norms whether in Japan or overseas. Compliance shall be complete and without exception.

Maintain Confidentiality

Each employee shall appropriately handle and safeguard information held within or passing through our company in accordance with its type, including company confidential information, third-party confidential information, and personal data.

Protect Intellectual Property

We recognize intellectual property as an essential resource underpinning our corporate activities, fully understand the legal significance of these rights, and, on that basis, make efforts to obtain, maintain and utilize these rights. We will respect other companies' intellectual property while protecting our own.

Reject Unethical Behavior

No employee shall use his or her position or role in the company for personal gain.

Act with Fairness in Our Business Dealings

In our dealings with customers, business partners and competitors, we must in every case act in a manner that is fair.