

# Compliance

Ensuring thorough compliance in line with our code of conduct.

## Our Basic Approach to Compliance

The Fujitsu Way, the philosophy of the Fujitsu Group, includes the Code of Conduct stipulating the basic rules that each and every employee is expected to follow in realizing our Corporate Vision.

This Code of Conduct clearly spells out the stance of the Fujitsu Group with respect to strict observance of laws, regulations and social norms, and indicates the rules and guidelines followed by everyone working in the Fujitsu Group.

## Code of Conduct

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Fujitsu Group employees will abide by this 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.



Code of Conduct (full statement)

<http://www.fujitsu.com/global/about/profile/philosophy/>

## Compliance Promotion Structure

In 2004, we established the Compliance Committee including an independent lawyer as an outside member.

This committee is responsible for nurturing a corporate culture of strict compliance with the social norms indicated in the Code of Conduct, and for constructing the necessary systems and structures to ensure the thorough diffusion and implementation of internal company rules.

Furthermore, we carry out activities aimed at instilling an awareness of compliance in cooperation with the Rules & Compliance Division of the Legal Unit.

## Operating the Helpline System

In September 2004, we established an internal helpline system at Fujitsu to handle reports from employees and provide consultation. We have been taking our efforts to promote compliance with the Code of Conduct.

The helpline is a resource for employees who, in the course of performing their duties based on the Code of Conduct, cannot decide whether a particular action is potentially in violation of the Code of Conduct or who are unable to report through normal management channels, and also for those concerned whether an action may violate laws or social norms. The helpline is available to all Group employees (including seconded, contracted, part-time or other short-term employees as well as temporary staff.)

Each of our domestic Group companies has also built and started operating similar helpline systems.

## Information Security

### Our Approach to Information Security (System of Related Rules)

We are working to strengthen information security based on our policy of promoting appropriate information management and use in strict compliance with internal rules and regulations. The Fujitsu Way "Code of Conduct" clearly spells out our confidentiality policy and is the foundation of our approach to information security. We have also devised seven separate rules relating to information management, "Rules for Management of Confidential Information", "Rules for Management of Personal Data", "Rules for Management of Third Parties' and Customers' Confidential Information", "Rules for Information System Security", "Rules for the Use of FUJITSU PKI\*", "Rules for the Use of Personal Computers and Networks", "Rules for Handling of Intellectual Property Rights", which we are working to assure are fully observed at Fujitsu and domestic Group companies.

#### \* Information Management Regulations for Fujitsu PKI Usage

These regulations govern the approach to personal authentication over networks and encryption.

### Strengthening Information Security at the Business Group Level

To assure the strongest possible information security management, we are working to implement a company-wide information security management structure.

The Group is at work in a wide variety of industries throughout society, and is organizing business groups in order to promote individual businesses. In view of different issues that arise in the information management and security of businesses with widely different characteristics, we are building dedicated information security management systems within each business group.

In the various Fujitsu business units and in some domestic Group companies, we have acquired ISMS (Information Security Management System) certification and are working to provide the most thorough management possible of customers' and others' confidential information.

## Personal Data Protection Initiatives

Previously, Fujitsu only acquired PrivacyMark certification for those business units whose business activities actually required it, but in August 2007 we acquired company-wide PrivacyMark certification.

In addition to implementing a Personal Data Protection Policy, we have strengthened our personal information management system by stipulating Rules for Management of Personal Data based on Act on the Protection of Personal Information in Japan, which came into force in April 2005. Now, however, with the acquisition of PrivacyMark certification, we intend to further strengthen our personal data protection.

Specifically, under the Rules for Management of Personal Data, each business unit is responsible for managing personal data. Also, with regard to personal information that requires particularly sensitive handling, detailed rules are prepared for each relevant project, and a manager responsible for auditing assesses the situation for observance of the rules and reports this

to the president.

Domestic Group companies are also promoting thoroughgoing management of personal information by acquiring PrivacyMark certification individually, according to their business needs.



## Protecting Intellectual Property

### Our Basic Approach to Intellectual Property Protection: Promoting Close Teamwork

The Code of Conduct of the Fujitsu Way explicitly states that "We protect and respect intellectual property". Fujitsu Group employees, in line with the Code of Conduct, understand that intellectual property is a critical business asset that supports corporate activities and that it gives our customers a sense of safety and trust in the Fujitsu Group as their partner, so employees are required to keep this constantly in mind as they perform their duties.

## The Structure and Mission of Promotion

Our Legal Unit and Intellectual Property Unit are responsible for handling everything from general issues concerning laws and legal compliance, through company-wide strategic planning and proposals and practices for acquisition, maintenance and management of intellectual property rights; negotiation of licensing agreements; the strategic planning, proposals and promotion of standardization activities; and the investigation and acquisition of information related to Fujitsu's business and its provision to each division within the company.

For patents, we have a research subsidiary, Fujitsu Techno Research Limited, that performs prior patent searches (to check whether a patent that we intend to apply for has already been awarded to some third party) and clearance searches (to determine beforehand whether products and services we intend to provide are protected by other companies' patents).

Furthermore, within each business group, there is someone responsible for taking strategic advantage of intellectual property during research and development.

## Respecting Intellectual Property

Infringing the intellectual property rights of other companies would not only directly threaten the viability of the Fujitsu Group but also cause serious difficulties for our customers. We therefore take great care to avoid this through various internal rules and procedures. Also, before releasing a new product or service, we make the greatest efforts to avoid potential infringement of other companies' intellectual property rights at every stage from early research and development until shipment, thoroughly checking for other companies' patents, aware that any product or service infringing intellectual property rights is defective.

And while we respect others' rights, we deal resolutely and swiftly with any and all infringements by other companies of Fujitsu's rights.

 **Intellectual Property Report**  
<http://www.fujitsu.com/global/about/ir/library/intellectualproperty/>