



Fujitsu Group Sustainable Procurement Policy

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Ver. 1.1

Fujitsu Limited
Global Supply Chain Unit

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Responsible Business Alliance – Code of Conduct

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First Edition	November 2023	Release of the first Edition
Ver. 1.1	June 2025	•Modified the description section of Part III. •Removed the guidebook from the main body.

I. Introduction

Fujitsu Group aspires “being a technology company that realizes net positive through digital services” and is offering a full range of technology products, solutions and services to a variety of customers.

Fujitsu Group’s purpose is “Make the world more sustainable by building trust in society through innovation”. In order to realize the purpose, by driving our experience and technology, we aim to deliver values to our customers and contribute to reliable society. Fujitsu operates all business based on “Fujitsu Way” which organizes purpose, values and Code of Conduct.

To realize our purpose, we have established non-financial management indicators in addition to financial indicators. Fujitsu Way Code of Conduct is stipulated as a keystone for Fujitsu to promote sustainability movement. Fujitsu will further enhance enterprise value and contribute to the local and international community throughout communicating with stakeholders.

The Responsible Business Alliance (RBA)* is the world’s largest industry coalition dedicated to corporate social responsibility in global supply chains.

Fujitsu Group joined the Responsible Business Alliance (RBA) in March 2017. Together with our partners, our strategy is to further strengthen initiatives related to Sustainability in our supply chain through the framework of RBA.

From 2018, Fujitsu has adopted the RBA Code of Conduct^{*1} as its CSR Procurement Guidelines. We expect our suppliers to support the Fujitsu Group CSR Procurement Guidelines and conduct their worldwide operations in a socially and environmentally responsible manner.

At this chance the Guideline is revised in 2023 and named “Fujitsu Group Sustainable Procurement Policy” to transform our views from company-based CSR to social-based sustainability. It is redesigned for suppliers to refer in accordance with their categories of business, i.e., a universal abridgment is prepared in Chapter II. Codes to be applied to Every Supplier, and RBA Code of Conduct is applied in Chapter III. Codes to be applied to Suppliers for Goods.

We Fujitsu have engaged in efforts to advance diversity and inclusion (D&I), based on the idea that “We respect fairness and equality, and promote diversity and inclusion,” as described in the Purpose Statement of the Fujitsu Way. Through this more inclusive and holistic approach to DE&I, we aim to achieve a sustainable society, looking not only at our own business, but also at the positive impact our technologies and solutions have on society. In FY2017, the Fujitsu Group issued a CEO Statement of Support for the Women’s Empowerment Principles, which were created by the UN Global Compact and UN Women. In doing so, we pledged our support of the principles. In FY2018, we also became the first Japanese company to pledge our support to the UN’s LGBTI^{*2} Standards of Conduct for business, and have been proactive overall in our adaptation to global trends in diversity. Fujitsu celebrates and respects different cultures within our organization and its supply chain.

*1 RBA Code of Conduct : <http://www.responsiblebusiness.org/code-of-conduct/>

*2 LGBTI: Lesbian, Gay, Bi, Trans, Intersex as defined by the UN Business Standards.

II. Codes to be applied to Every Supplier

This chapter is applied to every supplier/partner for Fujitsu.

The term “we” herein shall have the meaning of Fujitsu’s suppliers and partners.

Furthermore, chapter III is applied to every supplier that may design, manufacture or provide goods that are used for Fujitsu to design, manufacture or provide goods.

II. Codes to be applied to Every Supplier

1. Labor

1.1 Freely Chosen Employment

We do not use forced labor and we allow workers to leave our employment in accordance with the terms of their contract of employment.

We will support and respect the protection of internationally proclaimed human rights and ensure human rights laws are adhered to.

Any violations will be investigated and taken seriously.

Workers will be provided with a written employment agreement in their native language and any changes will only be made in agreement with the worker, and/or in accordance with local legislation.

Neither we, nor our agents will hold, destroy, or deny access by employees to their government-issued identity or immigration documents unless required by law.

Workers will not be required to pay employers, agents' recruitment fees, or other related fees for their employment.

1.2 Young Workers

We do not use child* labor.

Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

1.3 Working Hours

The working hours of our employees will not exceed the maximum set by local law.

1.4 Wages and Benefits

We will pay all workers in line with applicable laws, including minimum wages and overtime.

We will not withhold payments as a disciplinary measure, and will provide a clear statement to employees as to how payments are calculated.

1.5 Humane Treatment

We will ensure there is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment within our own organization or throughout our supply chain. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

* The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

II. Codes to be applied to Every Supplier

1.6 Non-Discrimination

We have a zero-tolerance policy towards all forms of discrimination and/or harassment. We are wholly committed to creating an inclusive work environment in which every employee, customer or supplier is able to contribute and thrive in hiring and employment practices such as wages, promotions, rewards, and access to training, irrespective of any identifying attribute including: age; sex, gender identity or expression; sexual orientation; race or ethnic origin, nationality; religious belief; disability; social background; political affiliation; marriage and civil partnerships; and carers and responsibility for dependents.

When acting as an approved supplier to Fujitsu, this commitment will be demonstrated when interacting with any Fujitsu, Customer or Supplier employee, regardless of the location and jurisdiction.

1.7 Freedom of Association

We shall, in accordance with local laws and regulations, respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

1.8 Supply Chain Diversity

We promote collaborations with a variety of suppliers in order to foster innovative cultures.

1.9 Accessibility

We are committed to providing workplace adjustments for any employee with a disability or health condition to enable them to carry out their role effectively, reach their potential and contribute to our success.

We will endeavor to ensure the offerings of our organization are accessible.

II. Codes to be applied to Every Supplier

2. Health and Safety

2.1 Occupational Safety

Worker potential for exposure to safety hazards are to be identified, assessed and controlled, and ongoing safety training provided. Where hazards cannot be adequately controlled, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with specific hazards.

2.2 Emergency Preparedness

Potential emergencies and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans.

2.3 Occupational Illness and Injury

Procedures are to be in place to prevent, manage, track and report occupational injury and illness.

2.4 Sanitation, food and housing

We will ensure workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by our organization or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, air conditioning, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

2.5 Health and Safety Communication

We will ensure workers are provided with appropriate workplace health and safety information and training is given in the language of the worker, or in a language the worker can understand, for all identified workplace hazards that workers are exposed to. Workers shall be encouraged to raise safety concerns.

II. Codes to be applied to Every Supplier

3. Environmental

3.1 Environmental Permits and Reporting

We will ensure all required environmental permits (e.g. hazardous materials storage), approvals and registrations are obtained, maintained and kept current and their operational and reporting requirements are to be followed.

Critical environmental concerns that pose a threat to our operations will be communicated to Fujitsu at the time of identification.

We will proactively communicate opportunities for changes to operations that could result in positive environmental impacts in the supply chain (providing such disclosure will not adversely impact our business or breach confidentiality).

3.2 Pollution Prevention and Resource Reduction

We will look to minimize or eliminate discharges of pollutants and generation of waste throughout our organization and supply chain.

We will reduce the use of water, fossil fuels, minerals, single use plastics and virgin forest products, and where possible, replace with renewable alternatives.

We will safeguard the natural environment by recycling or reusing our waste products wherever possible. Where this is not possible, we will ensure that waste is disposed of in an environmentally friendly way in line with local legislation.

To the best of our ability, we will disclose our key environmental data targets at an organizational level to enable our customers to understand our broader impact on the environment.

We will promote environmental sustainability both within our own organization and throughout our supply chain, through work practices, policies and training.

3.3 Hazardous Substances

We will ensure that chemicals and other materials posing a hazard to humans or the environment are identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

3.4 Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant greenhouse gas emissions (both direct emissions from owned or controlled sources, and indirect emissions from the generation of purchased energy) will be tracked, documented, and reduction target is planned at the facility and/or corporate level. We will endeavor to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

II. Codes to be applied to Every Supplier

3.5 Procurement of Goods & Services

We will procure goods & services based on environmental sustainability.

We will consider environmental sustainability in our own procurement processes and promote best practice within our own supply chain.

II. Codes to be applied to Every Supplier

4. Ethics

4.1 Business Integrity

(a) We have a zero tolerance policy towards all forms of bribery and corruption, including facilitation payments. This policy is communicated to our employees and suppliers. We have evaluated our exposure to bribery risks and understand the risks our business faces.

(b) We have procedures in place to prevent bribery in our business and in our supply chain. We will perform Due Diligence checks on all suppliers engaged by our organization. All employees will receive appropriate training on all aspects of our Anti-Bribery & Corruption policy.

4.2 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a supplier, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

We do not take advantage of competitors through unethical behavior or illegal means.

We do not use our position to secure an unfair advantage in dealings with business partners, and we do not correspond to any of economically unreasonable and/or unethical request from our counterpart.

We prepare management approval process for gifts and hospitality, and we record all the amount and number of time of them.

4.3 Disclosure of Information

We will ensure that business dealings are transparently performed and accurately reflected on our organization's business books and records. We understand and acknowledge that falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

II. Codes to be applied to Every Supplier

4.4 Intellectual Property

We understand and acknowledge that intellectual property rights are to be respected; transfer of technology and knowledge is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.

4.5 Fair Business, Advertising and Competition

We do not enter into any agreements or discussions with our competitors regarding restrictions on pricing, production or sales volumes, customers, sales territories, or other matters that impede fair competition.

4.6 Protection of Whistleblower's Identity and Non-Retaliation

We will ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers* is maintained, unless prohibited by law. We will endeavor to implement, or already have a communicated process for whistleblowers to be able to raise any concerns without fear of retaliation.

4.7 Information Management

We understand the regulations of the territories in which we do business governing the handling of different types of information and we comply with those regulations. In addition, we acknowledge the vital importance of information security to our customers and those they serve.

We have implemented security policies and procedures to prevent data loss and / or breach of confidentiality.

We comply with relevant security standards applicable to the data we handle.

We commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

*Whistleblower: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

II. Codes to be applied to Every Supplier

5. Management Systems

5.1 Company Commitment

We have management procedures in place to ensure compliance with The Policy. These procedures aim to protect our reputation and the reputations of those with whom we do business.

We will adopt and communicate this Policy, and work with our customers to allow its effectiveness to be monitored.

5.2 Management Accountability and Responsibility

We will identify a Senior Executive Sponsor ensuring implementation and monitoring of performance against this Policy.

5.3 Legal and Customer Requirements

We respect and comply with all applicable laws and regulations of the territories in which we do business. We endeavor to understand all relevant laws and regulations prior to initiating any business, abide by their principles and ensure through our actions that we do not inadvertently violate those laws.

We also conform to socially accepted business practices, use common sense in our dealings, and are careful to check whether our commercial terms are in line with local requirements. Customs vary from country to country, therefore, in addition to understanding the laws and customs of our home territory, we also respect and familiarize ourselves with the laws, customs and local requirements of other territories in which we do business.

5.4 Improvement Objectives

We will strive to continuously improve in all areas of responsible business and monitor and share the results of these improvements with our customers.

5.5 Supplier Responsibility

We make reasonable efforts commensurate with the size of our organization to flow the requirements of this Policy and monitor our supply base for compliance.

III. Codes to be applied to Suppliers for Goods

This chapter applies to suppliers of products to the Fujitsu Group. Where "Participating Companies" appears in the text,

We request that you carry out business activities in accordance with the latest version of the Responsible Business Alliance (<https://www.responsiblebusiness.org/code-of-conduct/>) Code of Conduct, which should read "Company" (each of our business partners).