

COMPLIANCE

Compliance Promotion

In the Fujitsu Group, the Risk Management & Compliance Committee, which is under the direct control of the Board of Directors and headed by the president, is responsible for overseeing Groupwide compliance at the global level based on our Basic Policy for Establishing Internal Control.*1 Together with the chief risk management & compliance officer (CRCO), who is appointed by the Committee and is tasked with carrying out its compliance-related policies and decisions, the Committee established the Global Compliance Program (GCP).

In cooperation with Regional Risk Management & Compliance Committees, which have been established as subcommittees in each region, the Committee strives to raise Groupwide awareness of the Fujitsu Way Code of Conduct and achieve compliance with the Code.

*1 Basic Policy for Establishing Internal Control
(Available only in Japanese)
<https://pr.fujitsu.com/jp/ir/report/2018/n119.pdf> (Pages 3-7)

The Fujitsu Way*2 Code of Conduct

The Fujitsu Way includes a Code of Conduct that all Fujitsu Group employees should follow (as shown on the right).

Fujitsu has refined the Fujitsu Way Code of Conduct, developed Global Business Standards (GBS) in 20 different languages to serve as a guide for legally compliant behavior for all Fujitsu Group employees around the world, and applies these standards uniformly across the Fujitsu Group.

*2 See the inside cover of this report for details on the Fujitsu Way.



The Fujitsu Way Code of Conduct



Global Business Standards

The Global Compliance Program

Fujitsu has established the Global Compliance Program (GCP) to implement and disseminate the Fujitsu Way Code of Conduct and GBS, and is working to maintain and further improve the global legal compliance structure across the Fujitsu Group.

The GCP systematically organizes our various compliance-related activities into five pillars. While clarifying what items

Fujitsu needs to address on a continual basis, the GCP also promotes external understanding of Fujitsu's compliance structure and its compliance activities. Based on the GCP, we take factors such as the legal systems of each country and region and the guidelines of their government institutions into account, and implement various policies and initiatives in each country and region.



Compliance Activities

<p>1. Policies & Procedures</p>	<ul style="list-style-type: none"> For Fujitsu and Group companies in Japan, we established the Compliance Policy under the guidance of the Risk Management & Compliance Committee to ensure compliance and promote sustainable improvement in our corporate value. We established more specific and detailed regulations and guidelines following approval of the Compliance Policy in areas with significant impact on business: antitrust, anticorruption, and anti-social forces. For overseas Group companies, we issued General Compliance Guidelines, a policy corresponding to the Compliance Policy in Japan along with global guidelines on competition law, and other guidelines concerning the prevention of bribery. In addition, to ensure rigorous due diligence at our business partners, our main overseas Group companies have been using an online third-party due diligence process.
<p>2. Top Commitment & Resources</p>	<ul style="list-style-type: none"> Fujitsu promoted top management's commitment to compliance through messages to employees and other communications. In this way, we are working to disseminate and implement the Code of Conduct and GBS throughout the Group. We have also assigned compliance representatives to each region and have formed a global network with each risk and compliance representative, in order to secure a structure for executing our GCP. The compliance representatives at Fujitsu and overseas Group companies meet at the Global Compliance Forum to share and discuss headquarters' policies concerning the execution of the GCP.
<p>3. Training & Communication</p>	<ul style="list-style-type: none"> We conduct compliance training for newly appointed officers of Fujitsu and Group companies in Japan, and we provide in-house training for managers and e-learning courses for all employees including new employees. Overseas Group companies also provide e-learning for employees in 72 countries in 20 languages based on the laws, customs, and business conditions in each country. We also provide group training by region and department, e-learning for new employees, and training for employees who are assigned overseas. During Fujitsu Compliance Week, which is held every December, top managers send out messages to all Group employees to ensure further edification of our GCP.
<p>4. Incident Reporting & Response</p>	<ul style="list-style-type: none"> Establishment of whistleblowing contact points: The Fujitsu Group operates the Compliance Line/Fujitsu Alert for both internal and external reports. The Compliance Line/Fujitsu Alert handles reports and provides consultations for all employees in the Fujitsu Group (including seconded, contracted, part-time or other short-term employees, temporary staff as well as retired employees). Group companies have established internal reporting systems individually. Compliance Line for suppliers: We are receiving reports from the suppliers of Fujitsu and domestic Group companies, to which we directly supply products, services, software, and other goods. Reports to Fujitsu Alert are accepted in 20 languages, at any time, on any day. Reporting to the Risk Management & Compliance Committee: The status of reports and consultations, as well as key compliance issues, is reported regularly to the Risk Management & Compliance Committee and the Board of Directors.
<p>5. Monitoring & Review</p>	<ul style="list-style-type: none"> The efficacy of the GCP is periodically checked and work is being done to continually improve it through risk assessments and audits and reviews by law firms and other external specialists. Fujitsu conducts audits in order to confirm observance of the Antimonopoly Act, and improve and continue the audit program as a communication tool with relevant departments. For overseas, the Fujitsu headquarters' compliance team conducts risk assessments by visiting Group companies in countries and regions with a high risk of corruption. Through interviews with executives and employees, as well as checks on internal policies and processes, the compliance team analyzes the potential compliance risks in local business and provides proposals and support to mitigate these risks.

For further details on the Fujitsu Group's compliance initiatives, please visit the following website:
<https://www.fujitsu.com/global/about/csr/compliance/>