

COMPLIANCE

In the Fujitsu Group, the Risk Management & Compliance Committee, which is under the direct control of the Board of Directors and headed by the CEO, is responsible for overseeing Groupwide compliance at the global level based on the Policy on the Internal Control System.*1 Together with the Chief Risk Management & Compliance Officer (CRCO), who is tasked with carrying out the committee's 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 sub-committees in each region, the committee strives to raise Groupwide awareness of the Fujitsu Way Code of Conduct and achieve compliance with the Code.

*1 "Policy on the Internal Control System"
<https://www.fujitsu.com/global/images/notice120b.pdf> (P2-7)

For further details, please visit the following website:
<https://www.fujitsu.com/global/about/csr/compliance/>

Goals

What Fujitsu Aspires to Be

The Fujitsu Group, from the perspective of maintaining and improving corporate value, recognizes that the installation and operation of an internal control structure, which includes compliance, is one of the most important aspects of management. The Fujitsu Group will disseminate the Fujitsu Way throughout the entire organization. Furthermore, the Fujitsu Group will be aware of a higher level of corporate ethics, which includes social norms in that scope, and will act with integrity in all of its business activities.

Goals for Fiscal 2022

To further disseminate compliance-related aspects of the Fujitsu Way Code of Conduct throughout the entire organization, the GCP is rolled out for the entire Fujitsu Group, thereby instilling a high level of compliance awareness in the organization, and management is to take the lead in fostering a corporate culture where each employee does not tolerate any wrongdoing (Zero Tolerance).

KPI Deliver messages from the CEO or the Heads of each Business Group/Region on the importance of Compliance (at least once a year)

Fujitsu Way*2 Code of Conduct

The Fujitsu Way contains a Code of Conduct, the fundamental principles that all Fujitsu Group employees should abide by, shown in the following figure. Fujitsu has also refined the Fujitsu Way Code of Conduct, developed Global Business Standards (GBS) in 20 different languages to serve as a guide

on legally compliant behavior for all Fujitsu Group-affiliated employees around the world, and applies GBS uniformly across the Fujitsu Group.

*2 See the inside cover and page 1 of this report for details on the Fujitsu Way.

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.

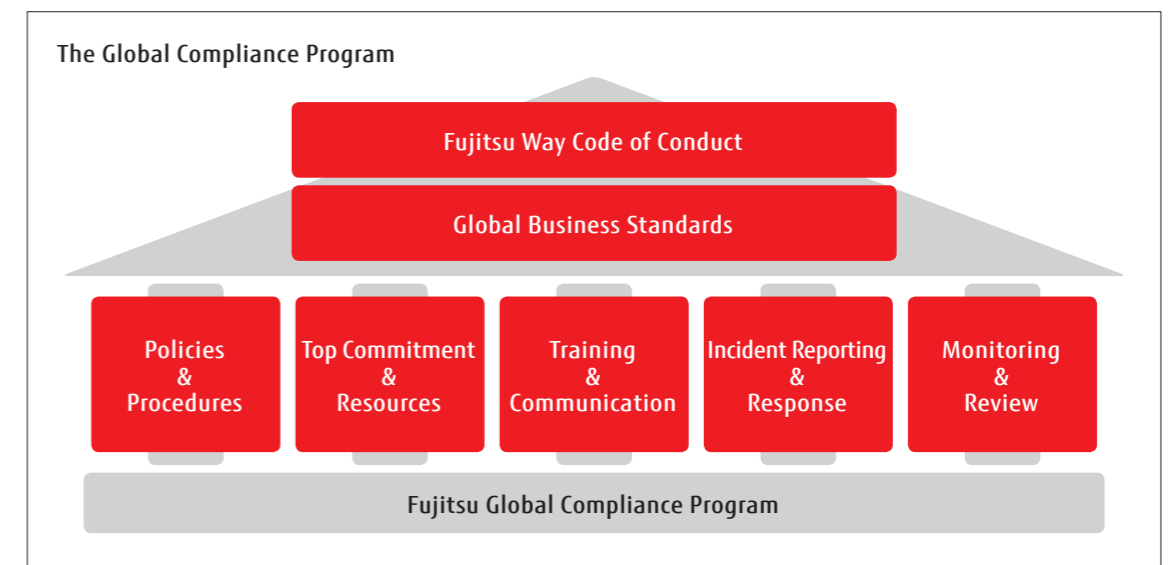
Fujitsu Way Code of Conduct
 Global Business Standards

The Global Compliance Program

Fujitsu has formulated the GCP in order to implement and disseminate the Fujitsu Way Code of Conduct and GBS, and is working to maintain and 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 this GCP, we take factors such as the legal systems of each country/region and the guidelines of their government institutions into account, and implement various policies and initiatives in each country and region.



Compliance Activities

1. Policies & Procedures	<ul style="list-style-type: none"> Each company in the Fujitsu Group has established internal rules and procedures necessary to ensuring compliance and promoting sustainable improvement in our corporate value. In particular, we issued guidelines that define the minimum requirements that the Fujitsu Group must meet in areas with significant impact on businesses, such as competition law, anticorruption, and security export control. Internal procedures such as third-party due diligence have been implemented that respond to risks, and continuous improvements are being made such as by standardizing the process within the Fujitsu Group or transferring to online systems.
2. Top Commitment & Resources	<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 Fujitsu 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 to execute the GCP. In order to implement the GCP effectively throughout the Fujitsu Group, the compliance representatives at Fujitsu and Fujitsu Group companies hold meetings to share and discuss the execution of the GCP.
3. Training & Communication	<ul style="list-style-type: none"> Once a year, we provide e-learning courses regarding compliance for all executives and employees in the Fujitsu Group. We also provide e-learning and group training sessions for new employees, or for employees in different levels and departments. During Fujitsu Compliance Week, which is held every December, top managers send out messages to all Group employees to ensure further edification of the GCP.
4. Incident Reporting & Response	<ul style="list-style-type: none"> 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). In addition, Group companies have their own internal reporting systems individually. Reports to Fujitsu Alert are accepted in 20 languages 24 hours a day, 365 days a year. We accept reports from suppliers of Fujitsu and Fujitsu Group companies in Japan from which products, services, software, and other goods are directly procured. The status of reports and consultations, as well as our responses to key compliance issues, is reported regularly to the Risk Management & Compliance Committee, the Board of Directors, and Audit & Supervisory Board members.
5. Monitoring & Review	<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 as well as reviews by law firms and other external specialists. Fujitsu's headquarters compliance team conducts risk assessments by visiting Group companies outside of Japan 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 businesses and provides proposals and support to mitigate these risks.