

Comment from Shin Nihon Environmental and Quality Management Research Institute Co., Ltd.

Since 1999, Fujitsu Limited (“Fujitsu” below) has been at the vanguard in disclosing corporate environmental information, and it now discloses CSR information as the Fujitsu Group Sustainability Report (“Sustainability Report” below). Furthermore, so as not to mislead stakeholders who are the readers of the Sustainability Report, Fujitsu has from the beginning engaged independent third-party assurance procedures to guarantee the reliability of the disclosed information.

At the same time, the same level of management and monitoring systems provided for economic activities must also be provided for environmental and social activities that are the basis of the company’s information disclosure. The Fujitsu Group is operating management systems such as their globally integrated EMS (see page 15 of the Sustainability Report) for environmental aspects as well as IT and other monitoring systems related to environmental performance and environmental accounting.

However, even at Fujitsu, which actively disseminates CSR information, the construction of systems like this for activities in the social realm is still in its infancy. To make its CSR activities even more effective, the Fujitsu Group must make clear its criteria for social performance aspects, which require continuous improvement as well as a stepwise expansion of the range of items monitored in this area.

Additionally, while it is important to manage both environmental activities and economic activities in a unified system, we think that to achieve this goal it would be effective to construct a mechanism in which the reductions in environmental burdens and other improvements achieved by improvements in quality and productivity and reduced costs can be recognized in terms of their environmental and social performance benefits.

* The opinion above was derived from work performed by Shin Nihon Environmental and Quality Management Research Institute Co., Ltd. within the range of procedures commissioned by Fujitsu during this fiscal year. Note that this research institute does not guarantee the content of this opinion.

TRANSLATION

Independent Assurance Report

September 22, 2006

Mr. Hiroaki Kurokawa
President and Representative Director
FUJITSU LIMITED

Shin Nihon Environmental and Quality Management Research Institute Co., Ltd
Representative Director Yasuo Kurihara

1. Scope and objectives of this engagement

The purpose of this assurance engagement, based on the contract with Fujitsu Limited (the “Company”), is to express an independent opinion on the Fujitsu Group Sustainability Report (the “Report”) in respect of whether the environmental performance data, environmental accounting data and material environmental information¹, which are prescribed in the institutional framework of the assurance engagement and the registration of the environmental report of the Company and its material subsidiaries, were accurately measured, calculated and covers all material aspects without omissions in accordance with the reporting standard of a social and environmental report. The reporting responsibility belongs to the Company’s management. Our responsibility is to express an independent opinion on the Report.

¹The material environmental information which are prescribed in the institutional framework of the assurance engagement and the registration of environmental report, are indicated in the “Environmental report assurance and registration mark standards” (The Japanese Association of Assurance Organizations for Environmental Information).

2. Outline of the assurance engagement procedures

We have applied limited assurance engagement procedures mainly composed of inquiry, review and analytical procedures in accordance with the “Practical guideline for assurance engagement of non-financial statements (exposure draft)” (Japanese Institute of Certified Public Accountants Jul 2005) and the “Practical guideline for assurance engagement of environmental information” (J-AOEI Jan 2006). Therefore, our assurance engagement provides relatively limited assurance compared to a reasonable assurance engagement.

Outline of the applied procedures is as follows;

- 1) Understanding and evaluating the collection and calculation process of the subject information described in the Report.
- 2) Recalculating and cross-checking the subject information described in the Report with the supporting evidence on a sample basis.
- 3) Verifying the consistency of the subject information with other information described in another part of the Report.
- 4) Conducting an onsite assessment² to make inquiries to the responsible persons, understanding the circumstances and verifying the supporting evidence per site visit.

²The onsite verification took place at the Head Quarter Office, Fujitsu Kawasaki Works, Fujitsu Mie Works, and two major subsidiaries: Fujitsu Iotec Limited and Fujitsu Frontech Limited.

3. Our opinion

Based on our assurance engagement, we have not come across any materially incorrect determinations or miscalculations, or omissions in relation to the environmental performance data, environmental accounting data and material environmental information prescribed in the institutional framework of the assurance engagement and the registration of an environmental report in compliance with the reporting standard.

4. Our independence

We, as a member of the Ernst&Young ShinNihon Group, are in compliance with the Certified Public Accountant Law, the ethics regulation of the Japanese Institute of Certified Public Accountants and the ethics procedure of Ernst&Young ShinNihon. Therefore, there has been no common interest between the Company and us.

NOTE: The above Independent Review Report was prepared based on the original Japanese version.