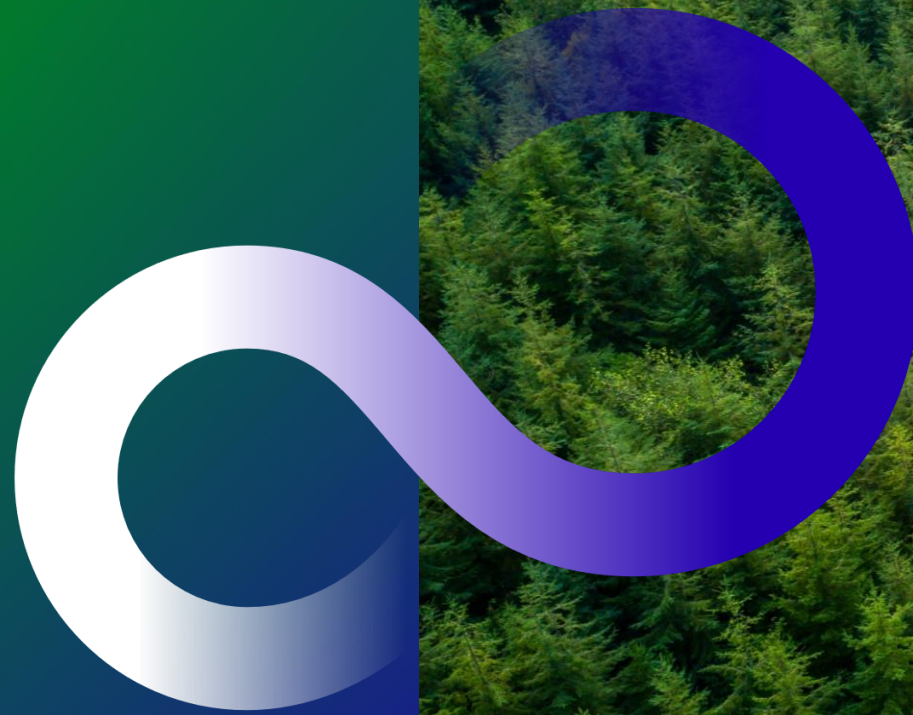


Global Business Standards



The Global Business Standards are guidelines that define, expand upon, and guide the interpretation of the six principles of the Fujitsu Code of Conduct.



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The principles explained in the Global Business Standards are described as follows:

- Background:
Provides the general background of each principle.
- Fujitsu's Position:
States Fujitsu's goals and commitments both internally and externally.
- Our Pledge:
Specifies the minimum actions that executives and employees should follow in their work.

1 Fujitsu Global Business Standards (GBS)

1.1 | Relationship between Global Business Standards and Code of Conduct

(1) Global Business Standards (GBS)

The GBS are guidelines that define and elaborate on the principles of Fujitsu's Code of Conduct to help executives and employees understand and apply the Code of Conduct in their actions.

(2) Code of Conduct

The Fujitsu Way comprises three parts: "Our Purpose," "Our Values," and "Code of Conduct." Among these, the "Code of Conduct" refers to the principles that every executive and employee should follow in their actions. All Fujitsu executives and employees are expected to act according to the principles established in the Code of Conduct in all situations.

Fujitsu conducts its business activities while closely interacting with society in countries around the world. In this context, It is crucial that we recognize our responsibilities as members of society first, before our roles as Fujitsu employees. We must act with sound ethics and integrity as responsible members of the community, in alignment with the expectations of our stakeholders.

The Code of Conduct reflects the expectations of stakeholders by articulating sound ethics and integrity as six principles, aligned with Fujitsu's values.

(3) Relationship between GBS and Code of Conduct

The Code of Conduct does not specify the exact actions that executives and employees should take. Additionally, ethical standards and integrity can vary with time and place. Therefore, the GBS define, expand upon and guides the interpretation of the six principles of the Code of Conduct.

Executives and employees are expected to understand the contents of the GBS and act independently upon that understanding.

Fujitsu Way Code of Conduct (Six Principles)



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

1.2 | Relationship with Compliance

Compliance at Fujitsu goes beyond mere legal adherence; it involves acting with sound ethics and integrity as a responsible member of society. From this perspective, compliance at Fujitsu is essentially represented by the Code of Conduct itself.

Therefore, the GBS serves as guidelines that illustrate Fujitsu's approach to compliance, and referring to it helps employees understand Fujitsu's values regarding compliance.

Fujitsu group companies establish specific policies and procedures as internal rules in line with the laws and regulations of each country, and adherence to these standards is required for all executives and employees. However, even if certain actions are not regulated by local laws or company policies, the GBS sets forth the minimum standards that all Fujitsu executives and employees must follow, irrespective of what country or company they are in.

Therefore, any actions that violate the provisions outlined in the GBS are not acceptable at Fujitsu.

1.3 | How to Use GBS

Fujitsu executives and employees understand and implement the GBS in their daily operations.

They also share the GBS with their employees and colleagues to promote a clear understanding of compliance-related values.

In situations where there is uncertainty about the appropriate decisions or actions, they refer to the GBS as a guide and engage in active communication with colleagues and superiors to ensure proper actions are taken.

Additionally, they utilize the GBS when explaining Fujitsu's core values and initiatives to external stakeholders.

1.4 | Response to Actions Contradicting the GBS

Any action that contradicts the GBS is a violation of the Code of Conduct and also breaches internal rules derived from it. Furthermore, compliance with the GBS is mandated by employment rules or contracts in some companies. When actions contradicting the GBS are identified, taking the following measures can help reduce the risks associated with such violations.

- (1) Consulting with supervisors or colleagues**
- (2) Consulting with the Compliance Division or other relevant divisions**
- (3) Whistleblowing**

Furthermore, Fujitsu actively monitors, prevents, and corrects actions that violate the Code of Conduct through a range of initiatives, including those listed below. Additionally, executives and employees are expected to cooperate sincerely with Fujitsu's initiatives.

- (1) Where concerns about compliance issues are raised through audits, whistleblowing, consultations, etc., appropriate enquiries and investigations will be undertaken by the Compliance Division with fairness and objectivity to determine the facts.
- (2) Where a compliance violation is confirmed or deemed likely, appropriate measures will be taken in accordance with applicable laws and regulations, including reporting and disclosure to authorities and stakeholders.
- (3) When a compliance violation is confirmed, corrective actions and measures to prevent recurrence will be implemented, along with enforcing disciplinary actions against the involved executives and employees.

Fujitsu's Initiatives

1

Regular reporting to and evaluation by the Risk Compliance Committee

2

Compliance audits

3

Training aimed at raising compliance awareness

4

Operation of the Fujitsu Alert Whistleblowing System

5

Implementation of disciplinary actions based on applicable laws, regulations, employment regulations, etc.

1.5 | Whistleblowing and Protection of Whistleblowers

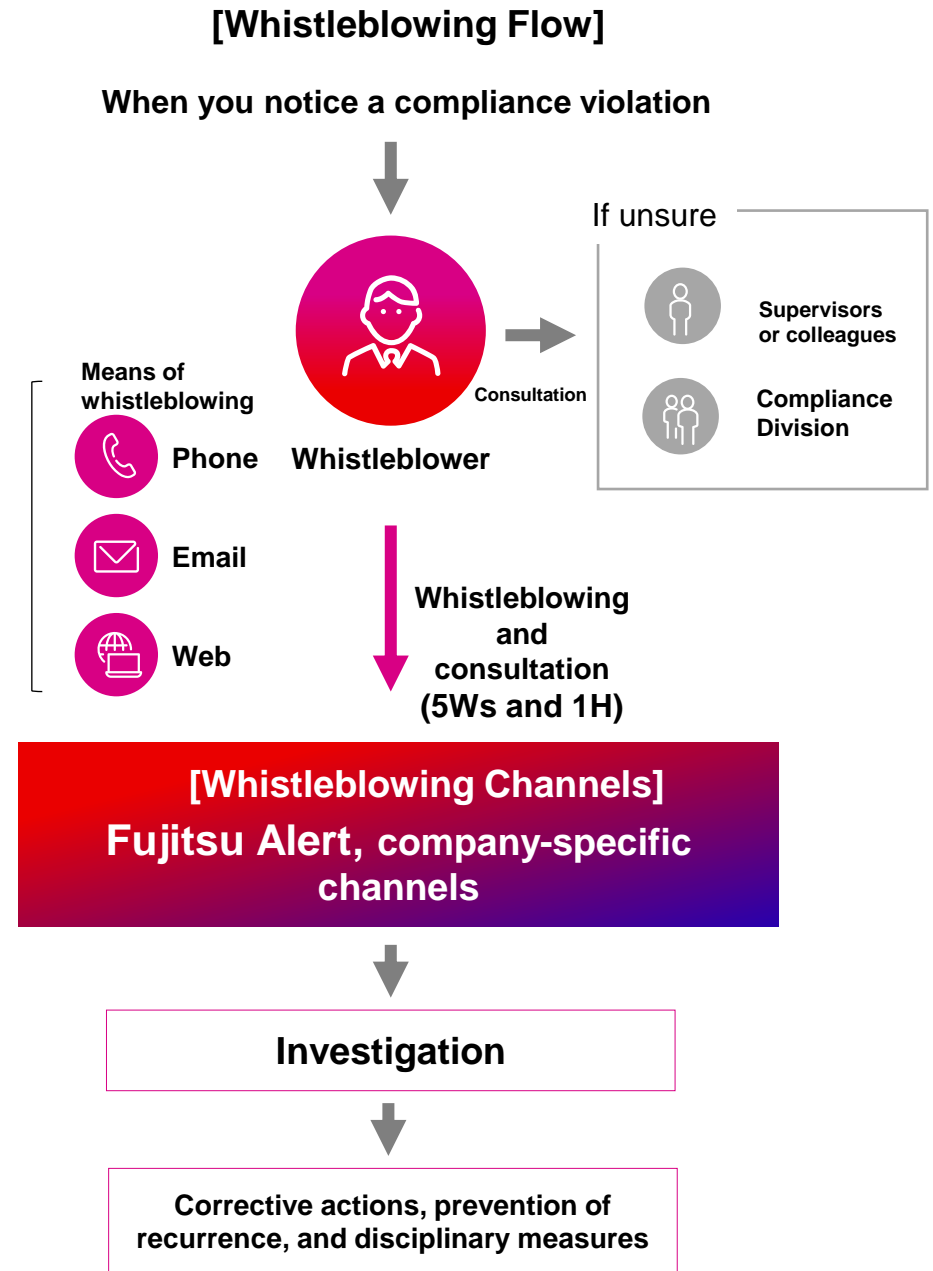
Fujitsu encourages executives and employees to seek advice and consult with supervisors, colleagues, or the Compliance Division if they are unsure about the correct course of action or if they notice violations of laws and regulations or internal rules, or the potential for such violations. Executives are expected to be attentive to their employees' concerns and support them in addressing these issues.

Additionally, Fujitsu has established whistleblowing channels (including Fujitsu Alert and company-specific channels) that can be used by Fujitsu executives, employees, and anyone involved in Fujitsu's business (including customers and business partners) to report any violations of laws, regulations, or internal rules, or the potential for such violations.

It is fundamental to Fujitsu's compliance program that people are able to report actual or suspected compliance breaches. Fujitsu prohibits any adverse treatment of whistleblowers or consulters based on their reports or consultations and ensures that they are thoroughly protected. Additionally, those who engage in such adverse treatment will be subject to disciplinary measures in accordance with employment regulations and other policies.

Please refer to each company's website/intranet for additional information on whistleblowing based on applicable local laws and regulations in individual countries.

More details [\[ENG\]Fujitsu Alert](#)





We respect
human rights



We comply with
all laws and
regulations

2 Respect for Human Rights and Diversity

2.1 | Respect for Human Rights

- Background

Human rights are defined as the "rights for humans to live with dignity, and are inherent rights possessed by all individuals from birth." As members of society, companies also have a responsibility to uphold human rights. Additionally, with human rights laws and regulations established worldwide, we are expected to act responsibly in accordance with these laws and regulations. Examples of human rights violations by companies include harassment, discrimination, forced labor, and child labor. Such human rights violations not only constitute legal infractions but also damage the company's reputation. With the globalization and diversification of business activities, respecting human rights is increasingly demanded both within our company and across domestic and international supply chains. We must remain mindful of this as we advance our business.

- Fujitsu's Position

In both the real and digital worlds, we will ensure that consideration for "respect for human rights" is reflected in all corporate activities, and that "human-centered value creation" is consistently carried out. Fujitsu will clearly demonstrate its commitment to operate with the spirit of "respect for human rights" as the foundation of all business activities and will strive to ensure that Fujitsu executives and employees exemplify this spirit through their actions. In accordance with the "Fujitsu Group Human Rights Statement," we aim to be a responsible company by incorporating respect for human rights into all our business activities.

Our Pledge

- 1 We will eliminate and avoid direct or indirect involvement in any unethical behavior that contradicts respect for human rights, including:
 - Forcing individuals to work against their will or condoning such practices.
 - Knowingly using or tolerating child labor.
 - Intentionally breaching employment laws in countries in which we operate.
 - Engaging in or being involved with modern slavery (acts that infringe on a person's freedom through threats, violence, deception, etc., including forced labor) and human trafficking.
- 2 We will not engage in discriminatory practices. We will respect the human rights of every individual and will not engage in unfair discrimination based on personal characteristics such as race, color, religion, creed, sex, social status, family origin, physical or mental disability, sexual orientation, gender identity, place of origin, age, or any other characteristics, nor will we tolerate any such discrimination.
- 3 We will not engage in harassment. We will avoid any form of harassment or abuse of authority that negatively impacts the respect for all individuals (including those who are not Fujitsu employees).

More details

[\[ENG\]Fujitsu Group Human Rights Statement](#)

2.2 | Respect for Diversity

- Background

In creating a flourishing society where everyone can freely pursue their potential, the principles of Diversity (D), Equity (E), and Inclusion (I) are essential.

This means building an environment where differences among diverse individuals are recognized, and people respect, support, and acknowledge each other.

At Fujitsu, we aim to secure and retain exceptional talent by establishing an environment where each employee can work comfortably and feel a strong sense of unity. Additionally, the contributions of employees with diverse perspectives and values drive innovation within the organization.

Conversely, a lack of awareness regarding the importance of embracing diversity can lead to a lack of respect for individuals' opinions and values. This can impede the development of fresh ideas and open discussions. This may result in decreased motivation among executives and employees and hinder innovation within the organization.

- Fujitsu's Position

Fujitsu is committed to responsible business practices that respect diversity. We will foster a fair and inclusive corporate culture where everyone can thrive with a sense of unity and succeed in their own way. Regardless of individual identity, we will ensure that everyone can acknowledge differences and actively contribute.

Through inclusive design and innovation, we will strive to make a positive impact on society and work towards a sustainable future by empowering each other.

Our Pledge

- 1 We will respect everyone's diverse way of being. We will value various opinions, perspectives, and values, and will not tolerate exclusionary behavior.

More details

[\[ENG\]Diversity, Equity & Inclusion](#)



We respect
human rights



We comply with
all laws and
regulations

3 Fostering a Safe and Secure Workplace Environment

3.1 | Fostering a Workplace Where Employees Can Work with Peace of Mind

- Background

Psychological safety in the workplace means that everyone within the organization can express their thoughts and feelings without fear.

For Fujitsu, achieving a high level of psychological safety is crucial, as it can lead to increased productivity, the generation of new ideas, and better employee retention. This enhances engagement and facilitates the creation of a workplace where all employees can work with peace of mind. Therefore, fostering such an environment is a key area of focus for Fujitsu.

- Fujitsu's Position

Fujitsu recognizes that "people" are our most valuable asset and is committed to creating an environment where all executives and employees can thrive in their work while maintaining good physical and mental health.

Our Pledge



- 1** To create a workplace where employees feel secure, we will eliminate behaviors such as coercion, intimidation, and violence, and demonstrate appropriate conduct.
- 2** Executives will lead by example to create such a workplace by:
 - Being proactive and encouraging open communication.
 - Acting as role models.
 - Maintaining integrity and building accessible relationships with their employees.
 - Setting clear and realistic goals and delegating employees with appropriate responsibility and authority.
 - Ensuring adherence to the GBS and creating an environment where everyone feels comfortable raising issues.
 - Reporting violations or potential violations and encouraging others to do so.

3.2 | Fostering a Workplace That Prioritizes Safety and Health

- Background

Ensuring the health and safety of executives and employees and creating a comfortable work environment leads to better health maintenance, accident prevention, and a sense of security at work.

Recognizing that people are the foundation of all business activities, Fujitsu views it as a critical responsibility to foster a workplace where everyone can work with confidence by adhering to applicable safety and health laws and regulations and protecting the safety and health of all executives and employees.

- Fujitsu's Position

Prioritizing the protection of mental and physical health and safety in all business activities, Fujitsu is committed to developing and maintaining healthy and safe environments tailored to local conditions to ensure the well-being and safety of all executives and employees.

Our Pledge

- 1** We will adhere to policies related to health promotion and maintenance, as well as safety and health, and act in accordance with these guidelines to protect the safety and health of employees.
- 2** We will manage working hours appropriately to support and protect employees' health.
- 3** In accordance with applicable laws, regulations, and internal rules, we ensure a safe and healthy work environment by prohibiting,
 - Possession or sale of illegal drugs.
 - Engaging in the use of illegal drugs.
 - Being under the influence of drugs or alcohol while working, regardless of location.
 - Carrying weapons of any kind.
- 4** We will consider the health and safety of not only ourselves and our colleagues but also everyone involved in Fujitsu's operations.



4 Promotion of Financial and Tax Compliance

- Background

Financial reporting is mandated by laws and regulations and involves the regular reporting of a company's performance. It provides insights into the company's current status and future outlook, and is utilized by stakeholders such as shareholders, investors, and business partners. Therefore, disclosing accurate financial information is crucial for building and maintaining trust.

If financial reports contain false information or misleading statements, it can not only lead to legal penalties under applicable laws and regulations but also expose the company to claims for damages from stakeholders and damage its trust and reputation. This can significantly impact the company's very existence.

Additionally, companies have tax obligations under applicable laws and regulations. Proper tax payment not only aligns with legal compliance but also contributes to social welfare. Failure to meet tax obligations can result in legal penalties and pose a risk to the company's trust and reputation.

Fujitsu, as a publicly listed company with numerous stakeholders, considers accurate financial reporting to be a fundamental obligation for legal compliance and securing stakeholder trust. In addition to fulfilling tax obligations as required by laws and regulations, Fujitsu places significant value on proper tax payments due to its emphasis on social contribution.

- Fujitsu's Position

Fujitsu is committed to establishing, implementing, and continually evaluating processes to ensure that financial reports accurately reflect the nature of transactions.

We will set our accounting standards and conduct accounting procedures in accordance with IFRS.

We will strive for accurate reporting and tax payments by complying with all applicable laws and regulations in each country, including the OECD's BEPS (Base Erosion and Profit Shifting) guidelines, with an understanding of their intent and principles. We will not engage in tax planning aimed solely at avoiding taxes, nor will we undertake profit shifting activities intended to evade taxes using tax havens.

Our Pledge

- 1 We will not engage in fraudulent transactions such as fictitious orders, inflated billing, or misallocation of labor hours.
- 2 We will handle transaction-related administrative processes appropriately in accordance with applicable laws, regulations, and internal rules.
- 3 We will ensure the proper storage of all necessary documents that serve as evidence for financial calculations, in compliance with applicable laws, regulations, and internal rules.



**We comply with
all laws and
regulations**



**We act with
fairness in our
business dealings**

5 Promotion of Fair Business Dealings

5.1 | Promotion of Fair and Free Competition

- Background

In many countries, Maintenance of Fair Trade, Antitrust laws and Competition laws (“competition laws”) are established to maintain and promote fair and free competition. These laws are based on the principle of encouraging innovation by companies, improving the quality and functionality of products and services, and fostering technological advancement, all of which protect consumer interests and contribute to economic development. . Any unfair means of impeding competition, such as bid rigging, cartels, or other forms of collusion between competing firms to set prices or trading conditions, is a violation of the laws and regulations and may result in significant fines for the company.

With the globalization of business activities, some countries may even consider actions taken abroad as violations of their own competition laws. Therefore, it is essential to identify the applicable laws and regulations for the intended business activities and ensure compliance with them.

Even for Fujitsu, which operates globally, competition with many other firms is unavoidable. However, profits obtained through unfair means are of no value to Fujitsu. Moreover, violations of competition laws carry the risk of being barred from competing in the business arena. Therefore, Fujitsu believes it is crucial for each executive and employee to understand the principles of competition laws and to refrain from any actions that impede free competition, regardless of the circumstances.

- Fujitsu’s Position

Fujitsu will respect the purpose and principles of competition laws and, in all its business activities, comply with applicable laws, regulations, and internal rules, avoiding any actions that impede fair and free competition.

Our Pledge

- 1 We will not engage in practices that restrict competition by colluding with competitors to fix prices, production or sales quantities, sales territories, customers, or other terms of trade. To prevent such practices, we will not exchange critical information related to competition limitations with competitors.
- 2 We will not engage in acts that restrict competition by pre-determining the winning bidder, contract terms, or amounts before a tender. We will also not engage in any acts that interfere with fair bidding, such as obtaining bidding information by improper means.
- 3 We will not engage in unfair practices, such as predatory pricing, to drive competitors out of the market.
- 4 We will not engage in deceptive acts, including false advertising or misleading pricing.

5.2 | Prevention of Bribery

- Background

Bribery involves offering or promising benefits to someone to induce them to act against their duties. Receiving bribes means accepting benefits or promises of benefits in exchange for performing duties in violation of one's obligations. In cases of bribery, the benefits involved are not limited to money; they can also include all forms of economic value, both tangible and intangible, such as gifts, entertainment, donations, political contributions, lobbying, and sponsorships.

Bribery distorts the essence of competition in business dealings and undermines fairness, which is why it is regulated in many countries. Although bribery regulations in any country primarily target public officials, the definition of who is covered varies from country to country. It should be noted that private companies may also be subject to bribery regulations regarding gifts and entertainment.

Fujitsu conducts business globally with various clients and partners, both public and private. While there may be occasions for gifts and entertainment in such business dealings, obtaining benefits through bribery or other illegal means is of no value to Fujitsu. Therefore, Fujitsu requires that each executive and employee correctly understands and adheres to laws, regulations, and internal rules, and refrains from engaging in bribery.

- Fujitsu's Position

Fujitsu will not engage in any form of bribery in accordance with applicable laws, regulations, and internal rules.

Fujitsu will not tolerate its executives and employees performing duties in violation of their responsibilities in exchange for any benefits.

Our Pledge

- 1 We will not engage in any form of bribery, whether directly or indirectly. We will also not engage in bribery through third parties (such as sales agents, consultants, and intermediaries).
- 2 When offering gifts or entertainment, we will do so within a reasonable scope based on social norms and within the bounds of the recipient's ethical guidelines, in accordance with our internal rules.
- 3 We will not make facilitation payments (payments required to expedite or facilitate administrative procedures) that violate applicable laws, regulations, and internal rules.
- 4 We will not engage in any acts that could be considered as receiving bribes, nor will we accept gifts or entertainment in exchange for acts that violate our duties, in accordance with applicable laws, regulations, and internal rules.

5.3 | Prevention of Money Laundering and Terrorism Financing

- Background

Money laundering refers to the process of concealing the origins of illegally obtained funds, such as those from drug trafficking or terrorism financing, to make them appear as though they come from legitimate business dealings. These illicit funds can also be used for terrorist activities or other forms of organized crime, which can have serious detrimental effects on healthy economic activities.

Many countries have established measures and obligations to prevent money laundering. Some countries require even non-financial institutions to report suspicious transactions that raise concerns about money laundering to the authorities.

Involvement in money laundering or failure to fulfill reporting obligations can result in sanctions.

Even if Fujitsu is not directly involved in money laundering, there is a risk that its transactions could be incorporated into money laundering schemes. Therefore, it is essential to understand such schemes and remain vigilant to avoid becoming involved in them.

- Fujitsu's Position

Fujitsu will not be involved in money laundering.

Fujitsu will comply with all applicable laws and regulations related to money laundering and counter-terrorism and will engage in transactions with trustworthy customers and partners who conduct legitimate business activities.

Our Pledge

- 1 We will not engage in or support suspicious or improper transactions, whether directly or indirectly.
- 2 If we encounter or suspect suspicious or improper transactions, we will promptly consult with the relevant divisions (such as Accounting, Legal, and Compliance Divisions).

5.4 | Promotion of Proper Contracts

- Background

A verbal contract refers to agreements or orders made verbally without formal written documentation. Verbal contracts tend to have vague and unclear terms, durations, and other details, which increases the risk of future disputes. Additionally, some countries have laws and regulations that prohibit verbal contracts and require all contracts to be documented and delivered in writing.

Furthermore, many countries regulate actions that abuse a dominant position to impose unfair trade conditions or otherwise disadvantage other companies, as these actions undermine the fairness of transactions.

When entering into contracts, it is important to follow applicable laws, regulations, and internal rules, ensuring that contracts are clearly aligned with the real aspects of the transaction, executed in a timely manner, and in the appropriate format.

Contracts form the foundation of Fujitsu's business activities, and ensuring that contracts are appropriate and accurately reflect the actual details of the transaction is crucial not only for legal compliance but also for accurately understanding the business situation.

- Fujitsu's Position

Fujitsu will conduct business dealings in a fair and honest manner. We will not engage in verbal contracts and will ensure all contracts are formalized to accurately reflect the agreed terms and conditions.

Fujitsu will not abuse its dominant position and will promote fair business dealings.

Our Pledge

- 1 We will enter into contracts in writing based on mutual agreement to ensure they accurately reflect the actual conditions of the transaction, and we will fulfill these contractual obligations.
- 2 We will fully comply with internal rules and procedures related to the initiation of transactions, payments, and other matters.
- 3 We will not engage in acts that abuse a superior position to impose unfair terms or cause disadvantage to other companies.



6 Promotion of Security Export Controls

- Background

To maintain international peace and security, all goods and technologies that could be diverted to the development, production, or use of weapons of mass destruction or conventional arms are regulated by international frameworks for security export control. Additionally, in uncertain international situations, exports to specific countries, regions, or individuals may be restricted by the laws and regulations of certain countries or regions. Since anyone can potentially violate export-related regulations, it is crucial to verify whether the destination of an export is subject to such restrictions. Violations may result in severe penalties, such as criminal or administrative sanctions. There is also a risk of damaging our reputation. As we conduct business globally, it is essential to ensure that our products, services, and export destinations are not subject to regulations.

- Fujitsu's Position

Fujitsu has internal rules promoting security export controls in accordance with applicable laws and regulations and has implemented security export controls appropriately to maintain international peace and security.

Our Pledge

- 1 We will conduct classification and transaction reviews before contracts and exports (or provision of services) at each stage, ensuring compliance with applicable laws, regulations, and internal rules, and will obtain any necessary export licenses. We will also rigorously re-verify these management procedures at the time of shipment and provision of technology.
- 2 In cases where it is difficult to make a decision in the course of business operations, we will proactively seek advice from the Security Export Control Division to prevent any violations of laws and regulations.



We comply with
all laws and
regulations



We act with
fairness in our
business dealings

7 Promotion of a Responsible Supply Chain

- Background

Responsible procurement refers to conducting procurement activities in the supply chain while addressing social demands such as environmental protection, human rights, and diversity. As stakeholder demands rise and there is a growing movement to invest in ethical and sustainable products and services, companies are expected to take responsibility for the entire supply chain from social, environmental, and ethical perspectives. This includes eliminating high-risk minerals that could lead to human rights abuse and sourcing parts and materials that consider the global environment.

Fujitsu is committed to promoting a responsible supply chain, fulfilling its social responsibilities, contributing to the realization of a sustainable society, and earning the trust of stakeholders.

- Fujitsu's Position

Fujitsu outlines the following procurement policies for its supply chain: “Co-existence with Suppliers,” “Fair and Proper Evaluation and Selection of Suppliers,” and “Promotion of Sustainability in Procurement Activities.” We are dedicated to achieving responsible and diverse procurement that prioritize human rights, environmental, and health and safety. Consequently, we will not engage with business partners who fail to respect these principles. We will also conduct due diligence to ensure that our business partners comply with applicable laws and regulations, and we will work to build relationships with partners who align with Fujitsu's values.

Our Pledge

- 1 We will consider important issues such as human rights, diversity, compliance, and the environment, and will require our business partners to comply with the “Fujitsu Group Sustainable Procurement Policy.”
- 2 We will not treat our business partners unfairly. Additionally, we will not abuse our superior position with them.

More details

[\[ENG\]Fujitsu Group Sustainable Procurement Policy](#)



**We comply with
all laws and
regulations**



**We protect and
respect intellectual
property**

8 Protection and Respect for Intellectual Property

- Background

Intellectual property consists of valuable information arising from human creative activities. This includes rights protected by laws and regulations, such as patents, utility model rights, design rights, copyrights, trademarks for product and service names and logos, as well as rights related to technical and business know-how.

At Fujitsu, our intellectual property is a crucial business asset that supports our activities by differentiating us from competitors and enhancing our competitiveness. Therefore, protecting intellectual property is essential for Fujitsu. We require our executives and employees to correctly understand its value and to protect and utilize it in accordance with applicable laws and regulations.

Additionally, it is important to respect others' intellectual property as well. Fujitsu may use third-party intellectual property, such as software or licenses, in the course of our business. Using third-party intellectual property without permission can lead to rights infringement, resulting in potential cease and desist orders or claims for damages from the rights holders, which may also impact Fujitsu's customers. Therefore, Fujitsu is committed to respecting third-party intellectual property.

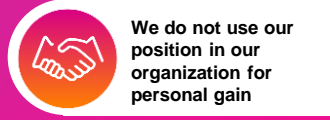
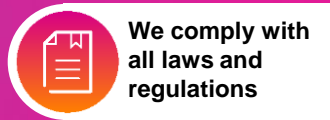
- Fujitsu's Position

Fujitsu will protect its own intellectual property, which brings value, and will also respect the intellectual property of others.

Our Pledge

To protect intellectual property, we adhere to all applicable laws, regulations, and internal rules.

- 1 We will safeguard Fujitsu's intellectual property that brings value by:
 - Identifying and protecting Fujitsu's intellectual property.
 - Consulting with the Intellectual Property Management Division or similar before disclosing or granting permission to use Fujitsu's proprietary information.
- 2 We will respect others' intellectual property by:
 - Respecting the copyrights and other intellectual property rights of others as protected by laws and regulations.
 - Checking the usage terms for others' software, applications, cloud-based services, and data to avoid license violations.
 - Respecting third-party intellectual property provided for limited purpose under nondisclosure agreement.
 - Consulting with the Intellectual Property Management Division or similar regarding licenses and permissions needed for using others' intellectual property.
 - Putting safeguards in place to avoid inadvertent disclosure of proprietary information of any previous employer.
 - Exercising caution with inventions made in side jobs and handling them according to divisional or organizational guidelines from an intellectual property perspective.



9 Promotion of Information Management

9.1 | Proper Handling of Confidential Information

- Background

Fujitsu handles a large amount of confidential information, which is regularly accessed by many executives and employees through the internal network. Organizational control information, such as personnel and accounting data, may include sensitive content, while technical data like research and development information, as well as business information such as customer and market data, can provide valuable insights for enhancing competitiveness. Additionally, Fujitsu may receive confidential information from third parties under confidentiality agreements. Such information should be treated with particular care, as it is a valuable asset entrusted to Fujitsu by the third party.

This confidential information is a company asset.

While useful for business activities, it also comes with an obligation to protect both our own and third parties' secrets, requiring strict confidentiality management. Improper handling can lead to a loss of competitiveness and credibility. Therefore, it is essential to always act with a strong awareness of confidentiality to ensure that this information is properly managed.

- Fujitsu's Position

Fujitsu will manage confidential information appropriately with a high level of security awareness, in accordance with internal rules and contractual provisions. Additionally, we will not tolerate any acts that involve obtaining confidential information through improper means or lead to its leakage.

Our Pledge

- 1** We will classify, define, and label materials containing confidential information based on their type or disclosure scope to ensure appropriate management that matches their confidentiality level.
- 2** We will obtain and use confidential information only to the extent necessary to achieve legitimate business purposes or fulfill contractual obligations.
- 3** We will store confidential information in environments where security is ensured and will understand and comply with Fujitsu-approved storage locations appropriate for the information type.
- 4** We will grant access rights according to the information classification or disclosure scope, and when sharing confidential information with business partners, we will impose confidentiality obligations through contracts, etc.
- 5** Upon expiration of the period for which retention is permitted by contract or when continued retention is no longer necessary, we will dispose of or return confidential information using reliable methods.
- 6** We will not engage in acts that could lead to unauthorized acquisition, removal, or leakage of confidential information.

9.2 | Proper Handling of Personal Information

- Background

At Fujitsu, personal data is routinely exchanged through the internal network. Information handled by the Human Resources and health management departments, which includes sensitive details about executives and employees, is regarded as confidential, while the customer and business partner information held by the sales department, which is crucial clients engagement and is both, valuable for business success and confidential.

This personal information is considered a company asset.

While this personal data is useful for business activities, it is essential to respect individual rights and interests and handle it in accordance with laws and regulations. Improper handling can lead to violations of personal rights, legal breaches, and loss of credibility. Additionally, when transferring personal data internationally, compliance with foreign laws and regulations is also necessary. Therefore, it is essential to always act with a strong awareness of legal compliance to ensure that personal information is properly managed.

- Fujitsu's Position

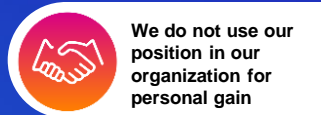
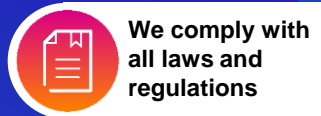
Fujitsu will handle personal information appropriately with a high standard of compliance, in accordance with laws, regulations, and internal rules.

More details

[\[ENG\]Privacy Policy](#)

Our Pledge

- 1 We will obtain and use personal information only within the scope permitted by laws and regulations and to the extent necessary to achieve our business objectives.
- 2 We will store personal information in environments where security is ensured and will understand and comply with Fujitsu-approved storage locations appropriate for the purpose of use.
- 3 We will grant access rights according to the purpose of use or disclosure scope, and when sharing personal information with business partners, we will impose confidentiality obligations through contracts, etc.
- 4 We will handle personal information appropriately in accordance with applicable laws and regulations when it is necessary to transfer it across borders.
- 5 Upon expiration of the period for which retention is permitted by laws and regulations or when continued retention is no longer necessary, we will dispose of or delete personal information using reliable methods.
- 6 We will strive to respond to complaints regarding the handling of personal information or requests for access to personal information in a manner that respects individual rights and interests.



10 Ensuring of Information Security

- Background

Amid the rapid increase in sophisticated and advanced cyberattacks, strengthening information security has become an urgent issue for national economic security and corporate economic activities.

In recent years, the use of cloud services has become indispensable for businesses, leading to a significant expansion of IT assets held by nations and companies. Should a security breach occur within these IT assets, causing harm to customers or other companies, it could result in serious consequences such as damages, penalties, and a decline in reputation.

Fujitsu holds a significant amount of IT assets. To ensure the safety and reliability of these assets and to handle information securely, it is crucial that these IT assets are properly managed throughout their entire lifecycle and that they maintain their ability to handle information securely.

- Fujitsu's Position

Fujitsu will ensure the safety and reliability of IT assets under its management and will properly manage and maintain them to ensure they handle information securely.

More details

[\[ENG\]Fujitsu Group Standard for Information Security
\(For internal use only\)](#)

Our Pledge

- 1 We will obtain IT assets, including secure and reliable cloud services, in accordance with the company's established procedures for proper procurement and use, and will adhere to the company's established scope of use.
- 2 To properly manage IT assets, we will identify and record the IT assets, including the use of cloud services, that we are responsible for in a management ledger, and we will monitor their usage and condition.
- 3 To protect IT assets appropriately, users of IT assets will implement the security measures prescribed by the company. Additionally, those involved in the planning, design, development, and maintenance of IT assets will assess security risks, implement appropriate security measures, continuously monitor their effectiveness, detect security incidents, and promptly respond and restore operations.
- 4 To maintain IT assets appropriately, we will continuously collect information about vulnerabilities and the lifecycle of IT assets and perform prompt and reliable maintenance.
- 5 To properly remove or dispose of IT assets, we will follow the company's procedures to safely remove or dispose of IT assets, including cloud services.



We comply with
all laws and
regulations



We do not use our
position in our
organization for
personal gain

11 Management of Conflicts of Interest

- Background

Conflict of interest refers to situations where personal interests of executives or employees conflict with the interests of the company, potentially harming or posing a risk to the company's interests.

Conflicts of interest may include using company assets or information for purposes unrelated to company business, leveraging personal relationships of executives or employees in company decision-making processes, taking on roles as executives or employees of competing companies, and engaging in transactions with competitors.

Fujitsu's executives and employees have a duty to prioritize Fujitsu's interests and business, including duties of loyalty and dedication. Acts that violate these duties not only harm Fujitsu's interests but also damage the interests of stakeholders, and therefore are not tolerated by Fujitsu.

- Fujitsu's Position

Fujitsu will not tolerate executives or employees to sacrifice the company's interests for their own benefit, or for the benefit of their relatives, friends, or other third parties, in situations where their personal interests conflict with the company's interests, by using their position or duties, company information, facilities, or assets, or by acting contrary to their responsibilities at the company.

More details

[\[ENG\]Standard Policy for Conflict of Interest \(For internal use only\)](#)

Our Pledge

- 1 We will consult with the relevant departments or make appropriate reports when the following conflicts of interest concerns arise:
 - Using company assets for purposes unrelated to Fujitsu's business.
 - Engaging in transactions for purposes unrelated to Fujitsu's business based on confidential information obtained during the course of business, whether from Fujitsu or another company, regardless of the name of the transaction.
 - Engaging in transactions directly or indirectly with Fujitsu, regardless of the transaction name.
 - Owning or managing a company that is engaged in a business similar to Fujitsu's primary business, creating a competitive relationship, while still employed at Fujitsu.
 - Taking on a role as an officer or equivalent position in another organization, or engaging with another organization, without being based on business instructions.
 - Receiving gifts, entertainment, services, or any form of convenience, whether tangible or intangible and regardless of their nature or purpose, from Fujitsu's customers or business partners.
 - Getting involved in the personnel processes (such as hiring, directives, evaluations, promotions, disciplinary actions, and terminations) of close relatives or friends at Fujitsu.
- 2 We will follow the instructions given by the company to prevent losses resulting from conflicts of interest.



We comply with
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regulations



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for personal gain

12 Prevention of Insider Trading

- Background

Insider trading refers to the act of buying or selling a company's stock or other securities by company executives, employees, or other related parties based on significant internal information ("material facts") that has not yet been made public. Trading in stocks or other securities based on such material facts allows individuals who use unfair methods or means to benefit unfairly, resulting in significant harm to the fairness, soundness, and credibility of the stock market, etc.

Therefore, many countries have laws and regulations that prohibit insider trading. If violated, criminal penalties or administrative measures may be imposed according to the applicable laws and regulations in that country, affecting not only the individual involved but also the entire company. Hence, insider trading that exploits "material facts" must be avoided.

As a publicly listed company, Fujitsu also places a high priority on maintaining the fairness, soundness, and credibility of the stock market, etc., and requires its executives and employees to refrain from engaging in insider trading.

- Fujitsu's Position

Fujitsu will fully comply with all applicable laws and regulations regarding insider trading. To ensure proper management of insider information and prevent insider trading, we will establish internal systems and take preventive measures.

Our Pledge

- 1 We will ensure that we understand and comply with applicable laws and regulations and will not engage in insider trading.
- 2 We will not use undisclosed "material facts" obtained from our company or other companies to trade in stocks or other securities.
- 3 We will not recommend or suggest to others trading in stocks or other securities based on undisclosed "material facts" obtained from our company or other companies.
- 4 When in doubt, we will consult with the Legal and Compliance Divisions or similar for advice.

Fujitsu Limited

November 2024, 3rd Edition

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