

Compliance

Ensuring thorough compliance in line with the Code of Conduct of the Fujitsu Way

Our Basic Stance

The Fujitsu Way, the philosophy of the Fujitsu Group, includes the Code of Conduct stipulating the basic rules that each and every employee is expected to follow in realizing our Corporate Vision.

This Code of Conduct clearly spells out the stance of the Fujitsu Group with respect to strict observance of laws, regulations and social norms, and indicates the rules and guidelines followed by everyone working in the Group.

 **Code of Conduct (full statement)**
<http://www.fujitsu.com/global/about/profile/philosophy/>

Compliance Promotion Structure

In 2004, we established the Compliance Committee including an independent lawyer as an outside member.

Aiming to achieve strict compliance with the social norms indicated in the Code of Conduct, this committee is responsible for ensuring the thorough diffusion and implementation of internal company rules, nurturing a corporate culture to comply with the Code of Conduct, and for constructing the necessary systems and structures.

Furthermore, in cooperation with Legal Division, Corporate Affairs, we carry out activities aimed at instilling an awareness of compliance.

Operating the Helpline System

In September 2004, we established an internal helpline system to handle reports and provide consultations for all Group employees (including seconded, contracted, part-time or other short-term employees as well as temporary staff) in order to promote compliance with the Code of Conduct.

This system is a resource for employees who, in the course of performing their duties based on the Code of Conduct, cannot decide on a particular course of action, or who cannot report through normal management channels their suspicions that an action may offend against the Code of Conduct, or who have a question whether it may violate laws or social norms. The system forbids any and all sanctions against employees for making such reports, and meticulous care is taken in handling the information so as to preserve their anonymity.

Each of our domestic Group companies has also built and started operating similar helpline systems.

Information Security

Our Approach to Information Security (System of Related Rules)

We are working to strengthen information security based on our policy of promoting appropriate information management and use in strict compliance with internal rules and regulations.

Specifically, the Fujitsu Way "Code of Conduct" clearly spells out our confidentiality policy and clarifies the foundation of our attitude to information security. In accordance with this policy we have devised seven rules relating to information management, including "Rules for Management of Confidential Information," "Rules for Management of Personal Data" and "Rules for Management of Third Parties' and Customers' Confidential Information," which we have been applying to Fujitsu and domestic Group companies and ensuring that their employees fully observe.

Strengthening Information Security at the Business Group Level

To assure the strongest possible information security management, we are working to implement a company-wide security management structure.

The Group is at work in a wide variety of industries and is promoting individual businesses by organizing them into business groups. Information security policy is implemented to reflect the individual characteristics of each business.

A number of business units at Fujitsu and some domestic Group companies have acquired ISMS (Information Security Management System) certification and are working to provide thorough management of confidential information including customers' information.

Building Awareness of Information Security

In FY 2008, using a common slogan that translates as "Declaration for complete information management! Information management is the lifeline of the Fujitsu Group," Fujitsu and domestic Group companies displayed posters at each of their business locations and affixed seals to all employees' PCs in an effort to increase the awareness of information security in every individual employee.



The seal: "Declaration for complete information management!"

Personal Data Protection Initiatives

In addition to implementing a Personal Data Protection Policy we have stipulated Rules for Management of Personal Data based on Japan's Act on the Protection of Personal Information, which came into force in April 2005. Every year, training and audits are conducted on the management of personal data in accordance with these rules. In August 2007, we acquired company-wide PrivacyMark certification and are working to further strengthen our personal data protection.

Domestic Group companies are also acquiring PrivacyMark certification individually as necessary, and promoting thoroughgoing management of personal data.

Overseas Group companies are also publishing privacy policies that meet their various national legal and social requirements on their main public Internet websites.



Information Security Report (in Japanese)
<http://jp.fujitsu.com/about/csr/management/security/>

* Please use the link appearing at the bottom of this web page to access the Information Security Report.

Protecting Intellectual Property Our Basic Stance towards Intellectual Property Protection

"We protect and respect intellectual property" is a basic tenet of the Code of Conduct of the Fujitsu Way. In line with this statement, all Fujitsu Group employees recognize intellectual property as an important business asset that supports Group activities and gives our customers a sense of safety and trust in the Group as their partner, so employees are required to keep this constantly in mind as they perform their duties.

Organizational Structure and Its Mission

Our Intellectual Property Unit is responsible for handling

everything from general issues of legal compliance concerning intellectual property through company-wide strategic planning and proposals and practices for acquisition, maintenance and management of intellectual property rights; negotiation of licensing agreements; the strategic planning, proposals and promotion of standardization activities; and the investigation and acquisition of information related to Fujitsu's business and its provision to each division within the company.

Each business unit has appointed a manager or director in charge of intellectual property to utilize it properly in its business or research and development. For patents, we have a research subsidiary, Fujitsu Techno Research Limited, that performs prior art searches* and surveys other companies' patents affecting products and services.

* Prior Art Search

This is to check whether an invention that we intend to patent has already been made public by another party.

Respecting Intellectual Property

Infringing the intellectual property rights of other companies would not only directly threaten the business of the Fujitsu Group itself but also cause major problems for our customers. To prevent this happening, we are therefore implementing various working rules and procedures.

We are also aware that any product or service that infringes intellectual property rights is defective, so from the initial stages of research on products and services to final shipment we take the greatest care to thoroughly check other companies' patents to avoid infringement.

And while we respect others' rights, we deal resolutely and swiftly with any and all infringements by other companies of Fujitsu's rights.

Intellectual Property Report
<http://www.fujitsu.com/global/about/ir/library/intellectualproperty/>



Global Activity

Our Stand on Intellectual Property Rights Worldwide

We seek to ensure the smooth deployment of the Group's global business by taking practical measures to obtain, maintain and actively employ intellectual property rights in accordance with the practices of the nations and regions within which we operate, concentrating on all processes from research and development through manufacturing to sales.

For example, we have established local representative offices in the United States and the People's Republic of China, and seek to identify all of the results of our research and development performed there, without exception, and prepare patent applications for them. For US patents, in particular, we not only extract inventions but have also set up a system to handle the whole patent prosecution process to ensure that we obtain the highest and most effective patent coverage.