

Compliance

We are ensuring thorough compliance in line with the Code of Conduct of the Fujitsu Way.

Compliance Promotion Structure

The Fujitsu Compliance Committee includes an independent lawyer as an observer and promotes the thorough diffusion and implementation of internal company rules, nurturing a corporate culture to comply with the Code of Conduct, and constructing the necessary systems and structures.

Furthermore, in cooperation with Legal Division for Corporate Affairs, the Compliance Office (as the administrative office of the Compliance Committee) carries out activities aimed at instilling an awareness of compliance.



Code of Conduct

<http://www.fujitsu.com/global/about/profile/philosophy/codeofconduct/>

Activities Promoting Compliance

The Fujitsu Group engages in various activities to ensure widespread awareness of the need for compliance.

In FY 2009, the Fujitsu Way e-learning course was carried out for the employees of all Group companies, with some 100,000 participating. The program cited practical examples of the Code of Conduct to increase their understanding of it.

Furthermore, to assist in obeying the Code of Conduct in daily work and the workplace, a guide entitled "Understanding and following the Code of Conduct" was published on the company intranet, introducing anti-monopoly and anti-corruption issues, etc. An internal system to handle reports and inquiries from employees on anti-monopoly issues has been established.

■ Compliance education

To ensure strict compliance, the Group invites external lawyers as lecturers on compliance to educate executives of Fujitsu and Japanese Group companies. The heads of sales divisions and branches are also given in-house training in anti-monopoly and other legal issues. Newly appointed managers are given regular instruction by in-house lecturers on the Code of Conduct, and the vital importance of compliance, with typical examples where legal decisions may be difficult.

Operating an Internal Reporting System

■ Helpline

Since September 2004, we have been operating 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).

■ Compliance line for suppliers

In August 2009 the existing helpline system was extended by a compliance line for suppliers to handle reports and inquiries directly from the employees of companies that supply Fujitsu with products, services or software, etc.

The system forbids any and all sanctions against employees and suppliers for making such reports, and meticulous care is taken in handling the information so as to preserve their anonymity.

Information Security

Our Basic Approach to Information Security

Within the Fujitsu Group, the commitment to information security is seen as an expression of the Corporate Values of the Fujitsu Way, which says that we seek to become our customers' valued and trusted partner, and to build mutually beneficial relationships with our business partners. This commitment also leads to the practice of maintaining confidentiality, which is included in the Code of Conduct. We see it as a vital aspect of our social responsibility.

In line with this approach, we have established the Fujitsu Group Information Security Policy, consistent throughout the world, and we are promoting information security in accordance with it.

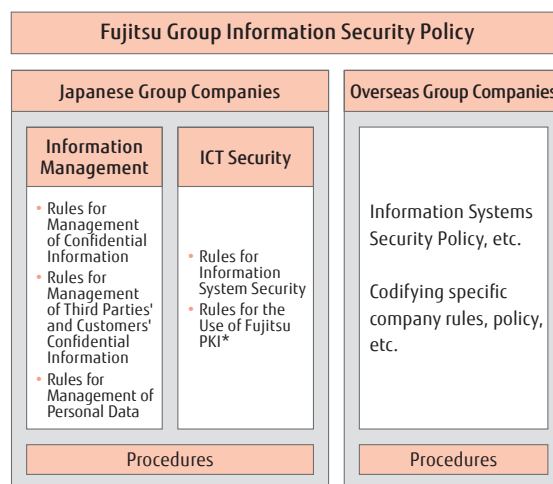


Fujitsu Group Information Security Policy (in Japanese)

<http://jp.fujitsu.com/about/csr/management/security/>

■ Our framework of information security rules

Each Group company codifies related rules in accordance with the Fujitsu Group Information Security Policy, and implements information security measures.



* PKI: Short for Public Key Infrastructure. Rules governing authentication of individuals, encryption, etc.

Strengthening Information Security at the Business Group Level

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

The Group operates in a wide variety of industries and is promoting individual businesses by organizing them into business groups. Information security measures are

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.

■ Teaching and promoting awareness of information security

Following on from FY 2008, using the same slogan which 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 in FY 2009. A mail checker tool was introduced to prevent E-mail being sent outside the company in error, and in parallel with promoting the use of ICT we increased the awareness of information security among all employees.

E-learning courses are held for all employees including executives every year.

Personal Data Protection Initiatives

We have stipulated a Personal Data Protection Policy and Rules for Management of Personal Data in accordance with Japan's Act on the Protection of Personal Information. Based on these rules, we give education on how private information should be handled and carry out surveys in an ongoing effort to strengthen the protection given.

In August 2007, we acquired company-wide PrivacyMark certification and this was renewed in September 2009. 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/>

Protecting Intellectual Property

Our Basic Approach Towards Intellectual Property

"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.

To encourage the proper handling of intellectual property, we established rules for its handling in 1995. These rules direct how all employees are to acquire and use intellectual property rights, and to respect those of other companies.

Respecting Intellectual Property

The Group regards any infringement of intellectual property rights by its products and services as a serious defect. To avoid infringing other companies' patents, we conduct thorough searches of their patents at the initial stages of research and development and prior to putting the products or services onto a market.

We protect our business by dealing resolutely and swiftly with any and all infringements of Fujitsu's rights, and at the same time we respect others' rights, as mentioned above.

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

T OPICS

How intellectual property rights can contribute to environmental preservation

The Fujitsu Group promotes contribution to environmental preservation also from perspective of intellectual property.

- (1) Patents related to environmental preservation that we do not use ourselves are licensed to others so that they can use them effectively.

Example

- Fujitsu Laboratories and the University of Tokyo jointly developed photocatalytic titanium apatite (Pat.No. 3697608 and 11 others), and licensed it to third parties for application to anti-bacterial masks.
- Environmentally friendly lead-free solder (Pat. No. 3357045 and two others), which reduces the disadvantages of high thermal loads on components and the high cost of using silver, has been licensed to several solder manufacturers.

- (2) To increase employees' awareness of the environment, we have established a system of awards for inventions that contribute outstanding solutions to environmental issues.