

# 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.

**WEB** 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.

We update our "Understanding and Following the Code of Conduct" guidebook as appropriate so that the code of conduct is implemented at the workplace and in business, and provide it over the Fujitsu intranet along with introduction of concrete examples of Anti-Monopoly Law or bribery problems. An internal system to handle reports and inquiries from employees on anti-monopoly issues has also been established.

In FY 2010, we implemented an educational activity for all Fujitsu employees in the form of a questionnaire in which employees could, through the questions and answers, deepen their understanding of the code of conduct and learn about methods for implementing it. This aimed at moving up to the next level; a phase in which every employee can practice the code of conduct with deeper understanding.

In FY 2011 we plan to implement an e-learning program based on the responses to the questionnaire carried out in FY 2010.

## 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. Furthermore, 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).

Each of the Group companies in Japan has also established and operates its own internal reporting system.

### 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

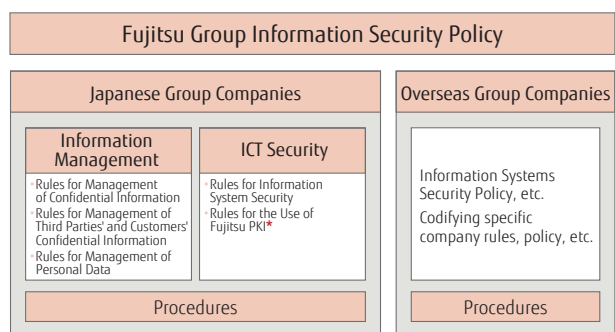
Within the Fujitsu Group, the commitment to information security is seen as an expression of the Corporate Values of the Fujitsu Way, which says that we seek to become our customers' valued and trusted partner, and to build mutually beneficial relationships with our business partners. This commitment 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.

**WEB** Fujitsu Group Information Security Policy (in Japanese)  
<http://jp.fujitsu.com/about/csr/management/security/policy/>

### 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

Starting in FY 2008, using a common 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, and we also affixed information security awareness stickers to all the business PCs used by employees. We introduced a remote data deletion solution (CLEARSURE) and a mail checker (SHieldMailChecker) tool 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 renew this certification every two years. 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.



This mark bears text that translates as "protecting your PRIVACY."

**WEB** Information Security Report  
<http://www.fujitsu.com/global/about/responsibility/management/security/reports/>

## 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.

Under the above code of conduct, we established an internal rule in order to encourage the proper handling of

intellectual property in October 1995. This rule specifies what all employees should do to acquire and use intellectual property rights and directs them 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.

**WEB** Intellectual Property Report  
<http://jp.fujitsu.com/about/ip/ireport/>

## TOPICS

### How Intellectual Property Rights Can Contribute to Environmental Preservation

#### Example 1 Smart Wall Power Socket

In addition to rendering visible the power consumption of plugged-in equipment from the first watt used, this power socket can also measure the standby mode power.

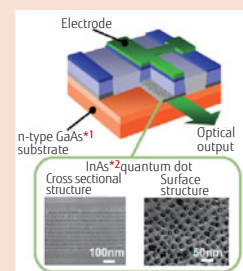
Since this socket can grasp any waste or variation in power used by individuals and electrical devices, it can promote energy savings without interfering with office productivity. Fujitsu has already applied for some 20 patents concerning this technology.



#### Example 2 Quantum Dot Laser

This quantum dot laser achieves high temperature stability and high temperature tolerance compared to conventional semiconductor lasers and was developed in a joint effort between QD Laser, Inc. and the University of Tokyo. This device can suppress the increasing power consumption associated with the rapidly growing use of the internet and the increasing performance of ICT equipment. Fujitsu has already applied for about 30 patents concerning this technology, of which 20 have already been granted.

In October 2010, the Ministry of Economy, Trade and Industry awarded us the Minister's Award for the category of "Savings in IT-related Energy Consumption" as part of the Green IT Awards 2010\*.



\*1 GaAs: Gallium arsenide  
 \*2 InAs: Indium arsenide

\* Green IT Awards: These awards recognize contributions to the development, promotion, or application of IT equipment, services, or solutions that reduce the amount of energy used by society. (Sponsor: Green IT Promotion Council, with support from the Ministry of Economy, Trade and Industry)