

Policy statement

Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains

Germany, January 2023

Responsibility to respect human rights and protect the environment

We are aware that we have a responsibility to respect human rights and protect the environment. We continuously strive to fulfill this responsibility in the best possible way.

Our policy statement describes the most important steps and measures that we take in our business operations to identify and avoid potential risks in the area of human rights and the environment. It thus implements the requirements of the law on corporate due diligence to prevent human rights violations in supply chains (hereinafter "LkSG").

We are committed to the international principles regarding the protection of human rights and the environment, which are reflected in Section 2 (2) and (3) LkSG. This includes in particular

- Compliance with the prohibition of slavery, child and forced labor;
- Compliance with the provisions on occupational health and safety and working hours;
- Recognition of the right of all employees to form employee representative bodies, to strike and to engage in collective bargaining;
- Equal treatment of all employees free from any form of discrimination;
- Granting of an appropriate wage, at least in the amount of the minimum wage stipulated by the applicable law;
- Compliance with the prohibition on causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption;
- Compliance with the prohibition of unlawful eviction or deprivation of land, forests and waters;
- Compliance with the prohibition on the use of private and public security forces if this threatens a violation of human rights;
- Compliance with the prohibition on the use of other forms of conduct that seriously violate human rights;

Fujitsu

Fujitsu Technology Solutions GmbH
Mies-van-der-Rohe Str. 8
80807 München
Deutschland
Telefon: +49-(0)89-62060-0
Web: www.fujitsu.com/de

Geschäftsführung

Rupert Lehner (Vorsitzender)
Anke Anderie
Jürgen Egger
Nana Kishikawa

Aufsichtsrat

Benno Zollner (Vorsitzender)
Lothar Kuhn (Stellvertreter)

Sitz der Gesellschaft und Registergericht

München,
AG München, HRB 113308
WEEE-Reg.-Nr. DE 71700018

Bankverbindung

Deutsche Bank AG, Paderborn
BLZ: 472 700 29
Konto Nr.: 522207000
SWIFT/BC: DEUTDE33472
IBAN: DE75472700290522207000
UST-IdNr.: DE113580069

- Compliance with the ban on the production of mercury-added products and the use of mercury and mercury compounds in manufacturing processes and the unauthorized treatment of mercury waste;
- Compliance with the ban on the production and use of banned chemicals;
- Compliance with the prohibition of environmentally unsound handling, collection, storage and disposal of waste and the unauthorized export and import of hazardous waste.

We have policies in place that integrate our commitment to protecting human rights and the environment into our daily actions, such as our internal Code of Conduct (Fujitsu Way and the Global Business Standards) and our standards for sustainable supplier relationships from Fujitsu (Responsible Procurement Charter).

Responsibilities

We have set up special processes within Fujitsu that are integrated into the existing compliance management system. We have defined the areas of responsibility for specific topics. If preventive or remedial measures are required to prevent or resolve issues during the risk analysis, these are developed and initiated by the relevant persons.

The Governance Platform Business Europe division has overall responsibility pursuant to Section 3 (1) No. 2 LkSG. This responsibility includes in particular the monitoring of risk management within the meaning of Section 4 (3) LkSG, including reporting and overall coordination.

Responsibilities for implementing the LkSG have been defined in the HR, Procurement, Supply Chain Management, Legal and Compliance departments.

Fujitsu has also designated a responsibility for monitoring risk management, in which Fujitsu has appointed a human rights officer.

Those responsible for implementing the LkSG report regularly to the Human Rights Officer on activities and progress.

Our management is also informed regularly, at least once a year, about the work of the responsible persons.

Risk analysis

We carry out appropriate risk analyses in order to identify, assess and avoid potential and actual negative impacts on human rights and the environment in our business area and our supply chain at an early stage. This includes the assessment of risks by the responsible specialist departments in our own business division. In addition, a multi-step analysis of our direct suppliers is carried out, which is based on assessments of the country of origin and products supplied and checked for plausibility. In the event of increased risks, the suppliers concerned are subjected to closer scrutiny and, if necessary, appropriate remedial and preventive measures are taken.

Any risks identified will be listed and described here as soon as we have carried out the first risk analysis in 2023.

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Preventive and remedial measures

We recognize the need to take immediate and appropriate remedial action when a human rights or environmental violation is identified. Depending on the severity of the violation, these measures may extend to the termination of business relationships. We recognize that effective protection of human rights can only be achieved by avoiding risks through preventative measures, which is why we carry out careful checks on our direct suppliers before entering into new business relationships.

In detail:

At present, these preventive measures include the following regulations in particular:

- Code of Conduct for own employees (available at [link](#)) and associated training courses
- Supplier Code of Conduct for direct suppliers (available at [link](#))

To date, Fujitsu has not identified any imminent or actual violation of a human rights or environmental risk. Accordingly, we have not yet had to take any remedial action.

Should Fujitsu identify an actual or imminent violation of human rights or environmental obligations, we will take appropriate remedial action without delay. If immediate cessation, prevention or minimization is not possible, we will develop and implement a plan with a specific timeline.

Fujitsu will review the effectiveness of the preventive and remedial measures once a year and on an ad hoc basis, in particular if we have to expect a significantly changed or significantly expanded risk situation in our own business area or at our direct supplier; preventive and remedial measures will then be updated immediately if necessary.

Complaints procedure

Grievance mechanisms are of particular importance in the detection and prevention of human rights and environmental risks and violations.

For this reason, we have expanded our electronic whistleblower system "Fujitsu Alert (Link)" to include the requirements of the LkSG. This whistleblower system enables both our employees and third parties to submit anonymous reports of violations in our own business area and at our direct and indirect suppliers.

We make our employees aware of this whistleblower system through training.

The information received is forwarded to the relevant specialist department, which processes it systematically and consistently.

The whistleblower can be included in the processing via the system on an anonymous basis in the event of queries. At the end of the process, the whistleblower is usually informed of the outcome in writing.

We follow up information on violations at our indirect suppliers in cooperation with our business partners and take the necessary measures depending on the severity of the violation.

Documentation and reporting

We adhere to the LkSG with regard to documentation and reporting.

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Expectations of our employees

We expect our employees to support Fujitsu to the best of their ability to appropriately prevent and, if necessary, eliminate or minimize the human rights and environmental risks described in the LkSG.

Expectations of our business partners

We expect our business partners to share our commitment to respecting human rights and protecting the environment and to implement appropriate due diligence procedures to identify and avoid human rights and environmental risks. To ensure that our business partners meet these expectations, we have introduced binding sustainability standards for Fujitsu suppliers, which they must observe in their business activities.

Closing words

We recognize that it is necessary to continuously improve our procedures for the protection of human rights and the environment and to ensure that they meet current requirements. To this end, we will regularly and systematically review and optimize the implementation of these principles. The management of Fujitsu Technology Solutions GmbH is responsible for the implementation of this declaration to ensure that both the headquarters and its subsidiaries are aware of their responsibility with regard to human rights and environmental obligations.

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