

## Fsas Technologies Limited: Modern Slavery Statement 2025

### Introduction

The continued prevalence of forced labour and human trafficking remains a serious global issue, with millions of victims affected worldwide. Fsas Technologies Limited (Fsas Technologies) has a zero-tolerance approach to these practices and will not tolerate them within our organisation or across our supply chain. Responsible business forms part of Fujitsu's core global strategy and vision, and Fsas Technologies aligns fully with the Fujitsu Group framework supporting the United Nations Sustainable Development Goals (SDGs). In particular, we are committed to minimising risks associated with forced labour, modern slavery, and human trafficking, as set out in SDG Target 8.7. Our commitment is both moral and legal, aligning with the UK Modern Slavery Act 2015 (Section 54, Part 6), the UN SDGs, and the Fujitsu Group's commitment to human rights as articulated in the Fujitsu Way and the Fujitsu Group Human Rights Statement.

### Company Overview

Established in 1935, Fujitsu Limited (Fujitsu) is Japan's largest IT services provider. The company's principal business areas include Service Solutions, Hardware Solutions, and Ubiquitous Solutions, delivered by 113,000 employees across 49 countries. Fujitsu Technologies Limited is a UK-incorporated legal entity and a wholly owned subsidiary of Fujitsu Limited. Fsas Technologies represents the Fujitsu Group's hardware and product-focused operations in the UK, encompassing the design, manufacture, distribution, and lifecycle management of IT hardware and associated technologies. Fsas Technologies operates as part of Fujitsu's global hardware supply chain, which includes complex, multi-tier international supplier networks. As such, Fsas Technologies recognises that its supply chain presents specific human rights and modern slavery risks, particularly in upstream manufacturing, logistics, and raw material sourcing. This statement has been prepared to meet the requirements of Section 54, Part 6 of the Modern Slavery Act 2015 and applies specifically to Fsas Technologies. It reflects the actions taken during the financial year ending 31 March 2025, while also outlining our forward-looking commitments.

### Governance and Responsibility

Fsas Technologies operates within the Fujitsu Group's global governance framework for sustainability, human rights, and responsible business. Oversight of modern slavery risk management is embedded within Fujitsu's established governance structures and policies. In the UK, responsibility for human rights and modern slavery matters is supported by:

- Fsas Technologies UK leadership,

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Christian Leutner  
Jürgen Egger

#### Supervisory Board

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Sabine Schweiger (Vice-Chairperson)

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- Dedicated human rights and responsible business roles in the UK,
- The Supply Chain Sustainability function at European level,
- Fujitsu Group-wide compliance, risk, and procurement governance.

Fsas Technologies works in close alignment with Fujitsu's global procurement, sustainability, and compliance teams to ensure that supplier due diligence, risk assessment, and remediation processes are applied consistently across the hardware supply chain. Any reference to supplier data or information in this statement relates to suppliers operating under Fujitsu Group procurement frameworks and policies applicable to Fsas Technologies activities.

### The Fujitsu Way

Since our founding in 1935, Fujitsu's technological heritage and collaboration with customers have shaped what we call the Fujitsu DNA. This DNA is rooted in the values of the Fujitsu Way, which provides the foundation for how we operate globally, including in the UK.

The Fujitsu Way comprises three elements: our **Purpose**, which is to make the world more sustainable by building trust in society through innovation; our **Values**, which are Aspiration, Trust, and Empathy; and our **Code of Conduct**, which sets the standards all colleagues must follow and incorporates our Global Business Standards.

Together, these elements form a unified framework that drives our commitment to ethical behaviour, innovation, and sustainable growth. The Fujitsu Way serves not only as our internal compass but also as the basis of our external relationships, including how we manage our supply chains and engage with partners. Its principles align with the UN Global Compact and the SDGs and underpin our commitment to eradicating forced labour and modern slavery.

### Code of Conduct

Our Code of Conduct embodies our commitment to responsible business and serves as a cornerstone of our operations worldwide. It sets out our obligations to respect human rights by adhering to the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions, and sectoral initiatives such as the Responsible Business Alliance (RBA).

The Code requires strict compliance with all applicable laws and regulations in every jurisdiction in which we operate, including the Modern Slavery Act 2015, the Equality Act 2010, and the Public Interest Disclosure Act in the UK. It commits us to fairness, transparency, and integrity in business dealings, to safeguarding intellectual property rights, to protecting the confidentiality of sensitive information entrusted to us, and to avoiding conflicts of interest.

The Code of Conduct is reviewed annually, and compliance is mandatory for all employees, contractors, and temporary staff. Training is delivered through our Global Compliance Training

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programme and reinforced through local inductions, manager toolkits, and targeted campaigns.

### Human Rights Statement

[The Fujitsu Group Human Rights Statement](#) further underpins our global commitment. First released in December 2014, it was revised in December 2022 to reflect developments in international human rights standards and to strengthen the Group's commitments in light of emerging challenges such as AI ethics, digital rights, and responsible sourcing.

The revised Statement has been prepared in 21 languages, including English and Japanese, to embed it within the culture of all group companies. It has been shared with major suppliers, who are asked to familiarise themselves with its contents and ensure compliance. The Human Rights Statement is complemented by a suite of internal and external policies, including the Fujitsu Group CSR Procurement Guideline, the Responsible Minerals Sourcing Policy, and the Fujitsu Group AI Commitment.

The Human Rights Statement affirms our alignment with international standards such as the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. It includes reference to the Fujitsu Guiding Principles for Respect for Human Rights in Employment, which commit us to equal opportunities, respect in employment practices, elimination of discrimination, and the prohibition of forced and child labour. It also explicitly recognises the rights of indigenous peoples, children, and human rights defenders. In addition, our climate strategy acknowledges the intersection between environmental impacts and human rights, particularly for vulnerable communities, which is reflected in our Environmental Action Plan and the Fujitsu Climate and Energy Vision. To monitor compliance and embed these principles, governance structures such as the AI Ethics and Governance Office and the External Advisory Committee on AI Ethics help identify risks, assess impacts, and inform our responsible innovation strategy.

### Procurement and Supply Chain Standards

Fsas Technologies is committed to the highest ethical, environmental, safety, and quality standards in both our business operations and our supplier engagements. Our procurement policies are designed to address modern slavery risks directly.

Our [Procurement Master Policy](#), which applies across Europe including the UK and Ireland, requires third-party suppliers to act ethically, fairly, and in compliance with the Fujitsu Way and Global Business Standards. It also mandates a due diligence process prior to supplier onboarding to assess potential human rights risks.

The [Fujitsu Group Sustainable Procurement Policy](#), aligned with the Responsible Business Alliance (RBA) Code of Conduct, sets out expectations for large and strategic suppliers to

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conduct operations in a socially and environmentally responsible manner and encourages cascading of these standards through their supply chains.

Our [Responsible Procurement Charter](#), first published in 2020, recognises that SMEs may not initially be able to meet the full RBA standards, but asks them to embrace the ethos of the Code and work towards compliance. The Charter outlines standards in labour, health and safety, environment, and business ethics, and is supported by onboarding materials and advisory sessions for suppliers.

Our [supplier contractual terms](#) reinforce these commitments, prohibiting child labour and forced labour, requiring dignity and respect for all employees, and granting Fsas Technologies the right to audit suppliers, terminate contracts for non-compliance, and require corrective action plans where needed.

Alongside these, Fsas Technologies maintains policies on antitrust and competition, recruitment, conflicts of interest, supply chain management, and whistleblowing. These policies are reviewed annually. Fujitsu's annual Global Compliance Training, delivered each December on the UN's International Anti-Corruption Day, reinforces these commitments across the organisation.

Given the nature of its hardware and product-focused activities, Fsas Technologies recognises that its supply chain may present heightened risks in upstream manufacturing, logistics, and raw material sourcing.

### **Due Diligence Processes**

Fsas Technologies implements robust due diligence processes designed to prevent and address risks of modern slavery and human trafficking.

Supplier due diligence is conducted through a risk-based questionnaire that assesses compliance with human rights, labour rights, environmental standards, and anti-corruption practices. SMEs are encouraged to sign the Responsible Procurement Charter as a first step, with a gradual progression towards full alignment with the RBA Code of Conduct.

Contractual protections are embedded in our supplier agreements, with explicit prohibitions on forced labour and child labour. These contracts grant us audit rights and allow for termination if suppliers fail to comply with agreed standards. Where issues are identified, corrective action plans are mandated.

Internally, all employees undergo right-to-work checks, ensuring compliance with immigration and labour laws. Where applicable, Fsas Technologies do not use zero-hour contracts, and we are recognised as an accredited Living Wage Employer by the Living Wage Foundation.

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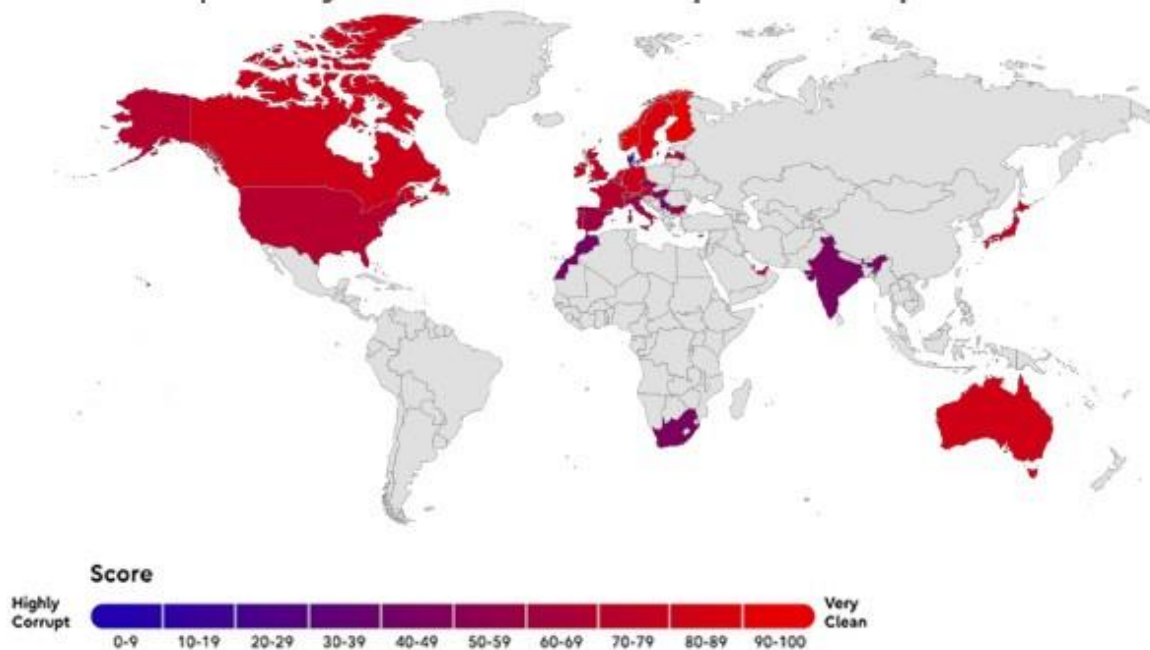
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## Risk Assessment and Management

Fsas Technologies undertakes an annual supplier risk-mapping exercise that incorporates Transparency International's Corruption Perceptions Index. This exercise demonstrates that over 99% of our supplier spend is with organisations based in low-risk countries. However, a very small proportion of our supply chain is located in jurisdictions classified as medium or high risk.

### Fsas Suppliers Mapped to the Transparency International Corruption Perception Index



During Financial Year 25/26, we will expand our risk assessments as part of Fujitsu's global sustainable procurement strategy. The methodology will evaluate exposure to modern slavery across four dimensions: industry risk, reflecting sector-specific human rights challenges; labour risk, addressing employment conditions and fair treatment; product risk, considering environmental impacts and conflict minerals in specific industries; and geographic risk, recognising higher exposure in countries with weaker governance and labour protections. We are also piloting supplier mapping tools to trace risks beyond Tier One suppliers, enabling us to identify risks deeper in the supply chain. When potential risks are identified, they are addressed through a combination of supplier engagement, audits, remediation plans, and ongoing monitoring.

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### Key Performance Indicators (KPIs)

To measure our progress and the effectiveness of our approach to addressing modern slavery risks, Fsas Technologies tracks the following KPIs:

- The percentage of suppliers assessed through ESG due diligence processes.
- The proportion of suppliers signed up to the Sustainable Procurement Policy and to the Responsible Procurement Charter.
- Completion rates for modern slavery training among procurement and supply chain management staff.
- Average supplier risk scores, considering country of operation, industry sector, and spend level.

Looking ahead, in Financial Year 2026 we plan to introduce a supplier maturity model that will enable us to measure and benchmark suppliers' progress against human rights and modern slavery commitments over time. If suppliers are classified as high risk as part of this assessment, they will be issued with a specific questionnaire to enable us to understand and mitigate the risk.

### Training and Awareness

Training is a critical component of our strategy to combat modern slavery.

Globally, our human rights training program has been restructured and is being rolled out across the Fujitsu Group, with a target of achieving a 90% completion rate by Financial Year 25. The program covers ILO Conventions, Fujitsu's Human Rights Statement, and expectations regarding ethical supply chains.

Within the UK, dedicated Modern Slavery training was delivered in 2024/2025, to all Fsas Technologies UK employees voluntarily completing the program, and completions are ongoing. The training covered the requirements of the Modern Slavery Act 2015, signs of modern slavery in supply chains, and how to report concerns. Awareness-raising activities on how to identify signs of modern slavery and take appropriate action were carried out both in the UK and globally during Financial Year 24/25.

### Whistleblowing and Grievance Mechanisms

Fujitsu maintains robust mechanisms to enable employees, contractors, customers, suppliers and other third parties to raise concerns confidentially and safely.

Our [Fujitsu Alert whistleblowing system](#) is accessible globally, available in multiple languages, and allows anonymous and confidential reporting of concerns, including issues related to modern slavery and human trafficking. It is accessible 24 hours a day, 7 days per week.

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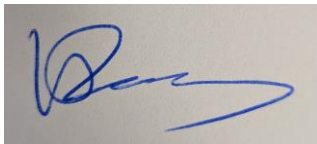
Fujitsu Alert forbids all sanctions against employees, suppliers, customers and other third parties for making such reports, and meticulous care is taken in handling the information to preserve their anonymity.

### **Conclusion**

Fsas Technologies remains firmly committed to preventing modern slavery and human trafficking across our operations and supply chains. Through the Fujitsu Way, our Code of Conduct, the Fujitsu Group Human Rights Statement, and our procurement and due diligence practices, we take a proactive stance to ensure that human rights are respected and safeguarded.

We recognise that eradicating modern slavery is a continuous process requiring vigilance, collaboration, and improvement. Our governance structures, training programmes, risk management processes, and whistleblowing mechanisms all work together to drive transparency, accountability, and meaningful progress.

Leigh Schwartz, Head of Fsas Technologies UK approved this statement on 30 January 2026.



Please direct any questions on this statement to Joley Gordon – Sustainability Lead, UK ([joley.gordon@fujitsu.com](mailto:joley.gordon@fujitsu.com)) or Maxime Maintier / Horst Bittner – Supply Chain Sustainability Lead ([maxime.maintier@fujitsu.com](mailto:maxime.maintier@fujitsu.com) / [horst.bittner@fujitsu.com](mailto:horst.bittner@fujitsu.com)).

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