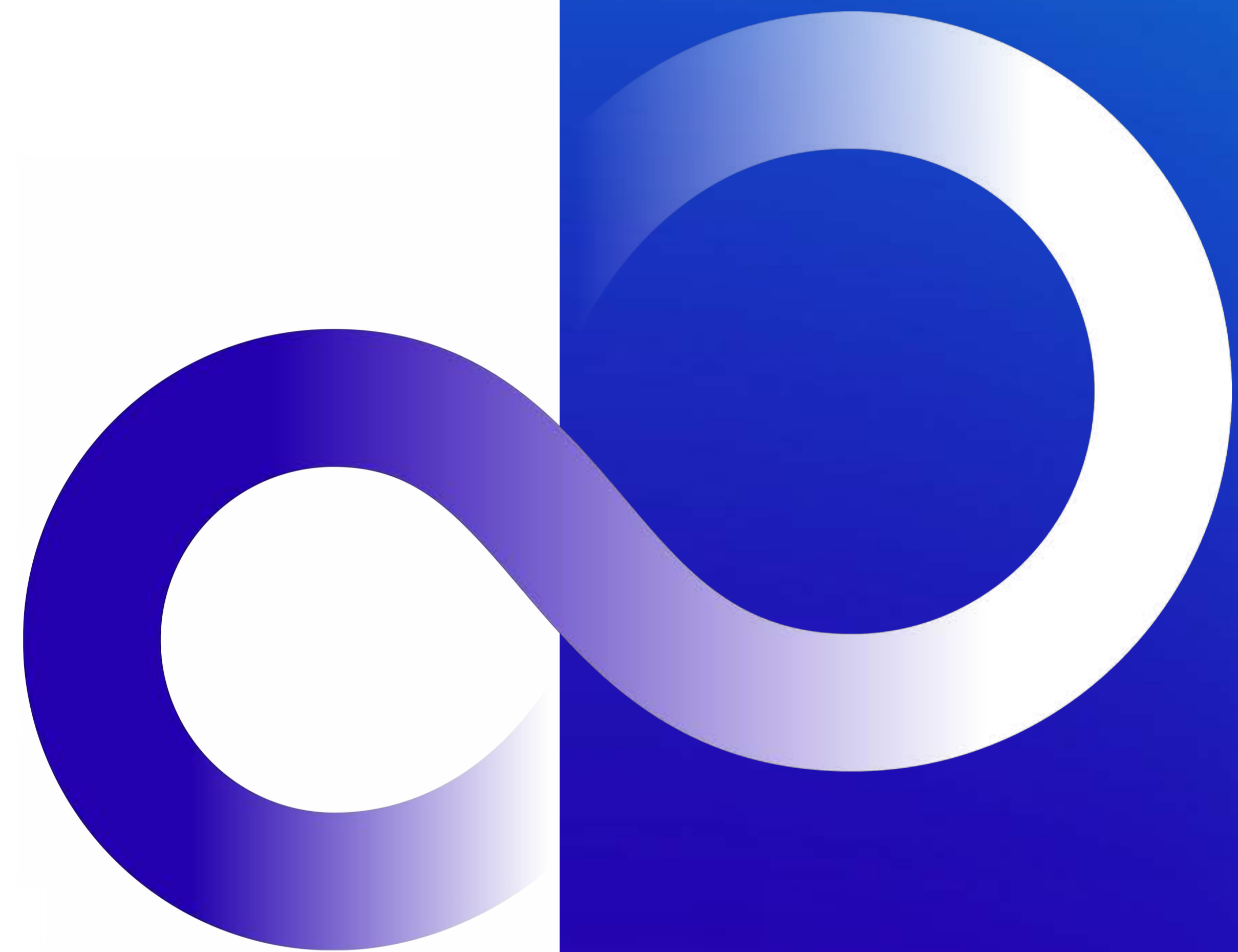


# Respecting Human Rights

Fifth Modern Slavery Statement for the  
reporting period 1 April 2023 - 31 March 2024

Fujitsu Australia Limited





# Acknowledgment of Country

Fujitsu acknowledges Aboriginal and Torres Strait Islander peoples as the First Nations of Australia. We acknowledge the traditional custodians of the lands on which our company is located and where we conduct our business. We pay Our respects to Ancestors and Elders, past and present. Fujitsu is committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society.

Artist: Jasmine Sarin ( JS Koori Designs).



## Message from the CEO

I am proud to present Fujitsu Australia's fifth Modern Slavery Statement. This statement affirms our ongoing commitment to uphold the human rights of all the people in our value chain and demonstrates our progress over the last year.

Fujitsu's commitment to eliminating the exploitation of workers is reinforced by our purpose to make the world more sustainable by building trust in society through innovation. This global mindset has inspired the expansion of the FY23 (April 2023 – March 2024) supplier questionnaire to a pool of over 750 suppliers across the APAC region, including critical and major suppliers in ASEAN for the first time.

We are pleased to once again confirm that none of our suppliers reported having any convictions of human rights breaches including modern slavery. Also, most critical and major suppliers disclosed they perform due diligence when engaging new suppliers. Having systems in place to regularly assess their suppliers for potential modern slavery risks.

This year, we have also created a ServiceNow based Modern Slavery Risk Register, conducted regular reviews for remediation actions and measured how we are progressing. We will continue to work with as many Fujitsu global entities and suppliers as possible to identify, analyse and mitigate modern slavery threats. We are encouraging mandated modern slavery requirements in their own procurement processes and will provide ongoing educational support.

Finally, we are reviewing and uplifting our current policies, practices, tools and platforms as required to ensure Fujitsu's modern slavery risk management framework remains in alignment with best practice.

I invite you to read more of this year's notable achievements and our plans for action-taking against the violation of human rights going forward.

The Board of Fujitsu Australia Limited have approved this Modern Slavery Statement on the 20th of August 2024.

A handwritten signature in black ink, appearing to read 'Graeme Beardsell'.

**Graeme Beardsell**  
EVP, CEO Fujitsu Asia Pacific (APAC)

# About this Statement and the Reporting Entity

This is the consolidated Modern Slavery Statement of Fujitsu Australia Limited (Fujitsu Australia or We, Us or Our) (ABN 19 001 011 427) which has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (the Act).

Fujitsu Australia was incorporated in New South Wales, Australia in 1972, as FACOM Australia Limited (FACOM – Fujitsu Automatic Computer) and changed its name to Fujitsu Australia Limited, in 1985. It currently has its registered office at Level 12, 255 Pitt Street, Sydney, New South Wales.

## Owned and Consulted Entities

The following entities are owned by Fujitsu Australia and are covered under this consolidated report.

### Enable Professional Services Pty Ltd

Subsidiaries: Enable Labs Pty Ltd, Enable Professional Services (Pte.) Ltd (Singapore), Enable Professional Services Limited (Hong Kong), Enable Professional Services Incorporated (Philippines), Enable Professional Services Private Limited (India)

### Fujitsu New Zealand Limited

Subsidiary: InPhySec UK Limited

### MF & Associates Pty Ltd

### oobe Pty Ltd

### oobe Pay Solutions Pty Ltd

### oobe New Zealand Ltd

# Table of contents

Acknowledgement of Country	2
Message from the CEO	3
About this Statement and the Reporting Entity	4
Organisational Structure	5
Fujitsu Australia and New Zealand at a Glance	6
Our Governance Framework	7
Human Rights in the Fujitsu Group and Fujitsu's Global Human Rights Statement	8
Our Operations	10
Our Supply Chain	11
3 <sup>rd</sup> Party Supplier Spend	12
Fujitsu Procurement Framework	13
Risks of Modern Slavery Practices in Operations and Supply Chain	16
Assessing and Addressing Risks Identified in Our Supply Chain	17
Supplier Risk Assessment Questionnaire	19
How Fujitsu Australia will Assess the Effectiveness of these Actions	21
Key Milestones from last Financial Year	22
Update on Our 3-Year Plan	23
Consultation with Reporting and Owned Entities	24

# Organisational Structure

Fujitsu Australia is a wholly owned subsidiary of Fujitsu Limited, a company incorporated and headquartered in Tokyo, Japan. Fujitsu Limited was founded 89 years ago in June 1935, and today is a leading Japanese information and communication technology (ICT) company offering a full range of technology products, solutions and services.

As of 31 March 2024, Fujitsu Limited and its 291 consolidated subsidiaries throughout the world, including Fujitsu Australia (Fujitsu Group), employs more than 120,000 people who help our customers in 180 countries. Fujitsu Limited reported consolidated revenues of 3.75 trillion yen (\$25.5B USD) for the fiscal year ended 31 March 2024. The Fujitsu Group Integrated Report can be found [here](#).

Fujitsu Australia is the primary trading entity of Fujitsu operating in Australia and New Zealand. Fujitsu Australia reported consolidated revenues of more than \$1.1B AUD for the fiscal year ended 31 March 2024.

Fujitsu Australia and New Zealand has over 3,200 employees working across different domains for the organisation and has 30 locations including 16 offices, 8 warehouses and 6 data centres.



# Fujitsu Australia and New Zealand at a Glance

**+30**

Fujitsu locations

**+1,500**

customers

**+3,200**

staff

**+50 years**

of innovation

**5<sup>th</sup>**

largest IT services provider in Australia and New Zealand

**+43,000**

square metres of data centre floor space

**Leader**

one of the leading ICT Companies in Oceania

**\$6.3M**

spent more than \$6.3M with First Nations owned businesses since 2017

**39 alliance partners**

4 global and 35 regional alliance partners



# Our Governance Framework

The Fujitsu Group has a solid corporate governance framework in place, and through our policies we communicate our values and expectations that all human rights must be respected, which includes zero tolerance for modern slavery. The **Fujitsu Way** defines our corporate vision philosophy and principles and comprises 3 parts: “Our Purpose”, “Our Values” and “Code of Conduct”.

Fujitsu is further guided by the following principles in our Fujitsu Australia and New Zealand Compliance Framework:

- A. As a business, Fujitsu aims to comply with not just the requirements of the law but also the spirit of these laws in the environment in which it operates.
- B. Regulatory compliance is broader than just ensuring legal obligations are met. Fujitsu complies with its stated compliance obligations, be they mandatory or voluntary in nature or external or internal to the organisation’s operations.
- C. Fujitsu is committed to achieving effective compliance which is critical to its success in achieving its strategic objective to be a leading ‘Digital Transformation Company’.
- D. Ensuring Fujitsu meets with its modern slavery compliance obligations is the responsibility of all staff at every level in the company.
- E. Fujitsu’s reputation, social responsibilities and commitment to its stakeholders rely on the highest standards of integrity in its staff.

Each principle is supported with regional policies. In Australia and New Zealand, we have policies that cover antitrust and competition, recruitment, conflicts of interest, supply chain and whistleblowing. These are reviewed annually to ensure they are up to date. Fujitsu’s annual Global Compliance Training is rolled out on the UN’s International Anti-Corruption Day every December, which is an online training requirement for all Fujitsu employees, which reinforces Fujitsu’s Code of Conduct and Global Business Standards.

<b>Our Purpose</b>	Our purpose is to make the world more sustainable by building trust in society through innovation	
<b>Our Values</b>	<b>Aspiration</b>	<ul style="list-style-type: none"> <li>• Set ambitious targets and act with agility.</li> <li>• Embrace diversity and create original ideas.</li> <li>• Stay curious and learn from failures and experiences.</li> <li>• Deliver positive impact through human centric innovation.</li> </ul>
	<b>Trust</b>	<ul style="list-style-type: none"> <li>• Honour promises and exceed expectations.</li> <li>• Act with ethics, transparency and integrity.</li> <li>• Work autonomously and unite for common goals.</li> <li>• Contribute to a trusted society using technology.</li> </ul>
	<b>Empathy</b>	<ul style="list-style-type: none"> <li>• Strive for customers’ success and their sustainable growth.</li> <li>• Listen to all people and act for the needs of our planet.</li> <li>• Work together to solve global challenges.</li> <li>• Generate shared value for our people, customers, partners, community and shareholders.</li> </ul>
<b>Code of Conduct</b>	<ul style="list-style-type: none"> <li>• We respect human rights.</li> <li>• We comply with all laws and regulations.</li> <li>• We act with fairness in our business dealings.</li> <li>• We protect and respect intellectual property.</li> <li>• We maintain confidentiality.</li> <li>• We do not use our position in our organisation for personal gain.</li> </ul>	

# Human Rights in the Fujitsu Group and Fujitsu's Global Human Rights Statement

The Fujitsu Group is committed to respecting the Human Rights of stakeholders related to its business operations, products and services. This principle underpins all our corporate activities within the group as an express action within our "Code of Conduct".

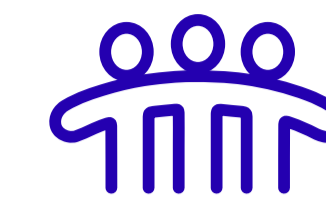
Fujitsu Group Human Rights Statement applies to all employees of Fujitsu and is encouraged to be adopted by our external stakeholders too. It clearly sets out our overarching approach to respect for human rights, which includes:

- Fujitsu's support for upholding important international standards, such as the ten principles of the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
- Our commitment to respect the human rights of all officers and employees, our supply chain, customers and end users of our products and services, including the use of AI.
- Our commitment to other stakeholder groups and human rights issues that we know challenge society today, such as climate change, rights of Indigenous peoples and children.
- Our approach to human rights, how we comply with applicable laws, conduct due diligence, conduct impact assessments, mitigate adverse impacts, track the effectiveness of our commitments and commit to remedy where applicable.
- A key aspect of our commitment to human rights is education and awareness. We encourage dialogue and continuous improvement.

As part of our ongoing supplier engagement and collaboration activities, the Human Rights Statement has been distributed to all third-party suppliers servicing our Australia and New Zealand operations.

The Human Rights Statement has been prepared in 21 languages to ensure that it is embedded in the corporate culture of all Fujitsu group companies.

## The UN Global Compact: The 10 Principles



### Human Rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** Make sure that they are not complicit in human rights abuses.



### Labour Standards

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** The elimination of all forms of forced and compulsory labour;

**Principle 5:** The effective abolition of child labour; and

**Principle 6:** The elimination of discrimination in respect of employment and occupation.



### Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** Undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.



### Anti-Corruption

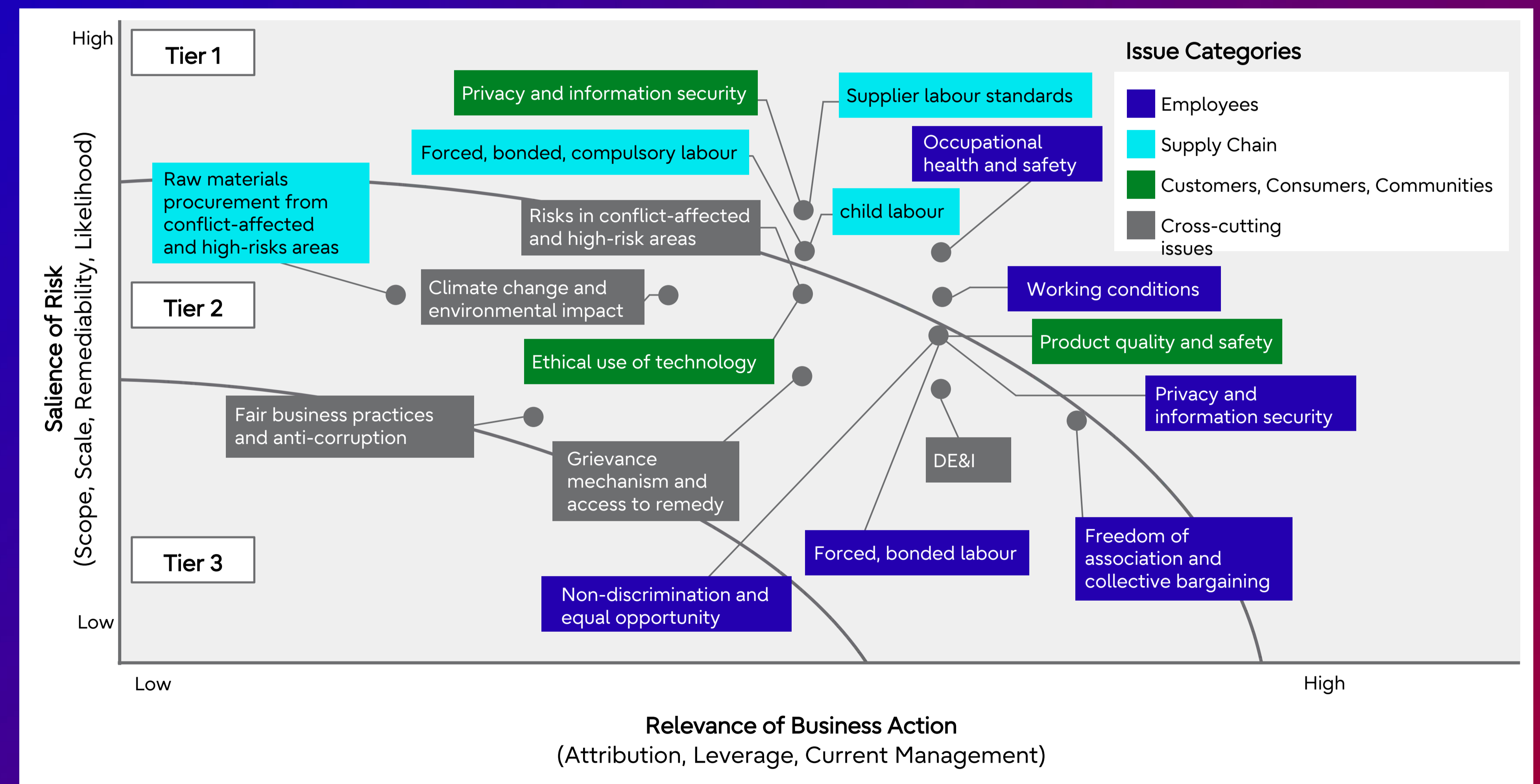
**Principle 10:** Businesses should work against all forms of corruption, including extortion and bribery.



The Fujitsu Group demonstrates its dedication to human rights through the Global Responsible Business Human Rights pillar. A key human rights organisation was established in the CEO's office directly under the CEO to work with the corporate and business divisions to promote activities to resolve human rights issues throughout the value chain. Regular meetings have been established with human rights representatives in each region to promote initiatives globally.

Following on from Fujitsu's global Human Rights Impact Assessment in 2022 conducted by Business for Social Responsibility (BSR), an international NPO (Non-Profit Organisation), Fujitsu has instigated a variety of initiatives to mitigate the risk of human rights across our three salient issues of employees, customers and end users and suppliers. These include but are not limited to, the formulation of the Fujitsu Group Sustainable Procurement policy based on the Responsible Business Alliance guidance. The promotion of Work Life Shift, enhancing our systems to support a variety of working styles, based on telework and actively utilising flexible working arrangements such as flexitime and discretionary work systems. Fujitsu has also delivered a new resource toolkit to offer guidance on the ethical impact of AI systems as part of its mitigation activities for customers and end users.

## Human Rights Issues Identified through Human Rights Impact Assessment (2022)



# Our Operations

Fujitsu Australia and New Zealand is a leading service provider of business, information technology and communications solutions. As one of the largest ICT companies in the Australian and New Zealand marketplace, we work closely with our customers to consult, design, build, operate and support their business solutions. From strategic consulting to application and infrastructure solutions and services, Fujitsu Australia and New Zealand has earned a reputation as a supplier of choice for leading corporate and government organisations.

As part of Fujitsu's continuous expansion strategy, Fujitsu Australia has acquired oobe, InPhySec, Enable and MF & Associates in recent years.

**oobe**, a digital security solutions provider with product portfolio that spans modern workplace, desktops, apps, data, cloud and cyber. oobe is to be fully integrated into Fujitsu Australia during Financial Year 2024.

**InPhySec**, market-leading cyber security consulting provider in New Zealand. It is recognised for its Intelligence-led security, providing Managed Security Services, Security Consulting, Technical Security and Physical Security. As of 1 April 2024, InPhySec has been fully integrated into the Fujitsu New Zealand business.

**Enable**, a professional services company have dedicated practices of certified and experienced business consultants across Customer Service Experience, IT Transformation, Employee Service Experience and Integrated Risk Management. As of 1 April 2024, Enable Australia and Enable Singapore have been fully integrated into Fujitsu Australia under the new ServiceNow, APAC business. The rest of the Enable group of companies will be fully integrated into Fujitsu Australia later.

**MF & Associates**, a Canberra-based company, whose strong dedication to fostering an inclusive and empathy-led workforce is making a difference for its clients across management, technology and cyber security consulting. MF & Associates aims to be the most trusted and ethical consulting organisation, doing good work for its clients and doing right by its people. MF & Associates is to be fully integrated into Fujitsu Australia during Financial Year 2024.

All new businesses will adopt Fujitsu's governance framework, follow the same modern slavery protocols and comply with Fujitsu's aim to eradicate any modern slavery practices and uphold human rights compliance.

Fujitsu Australia outsources several of its functions to Global Delivery Centres (GDCs), WeServ Philippines and Fujitsu Consultancy India. Though GDCs are separate legal entities, all Fujitsu Group companies sign up to the 'Fujitsu Way' and comply with Fujitsu Corporate Social Responsibility initiatives.

Fujitsu Global Compliance oversees the implementation of the compliance framework across the Fujitsu Group.



# Our Supply Chain

Fujitsu Australia's supply chain consists of intercompany and third-party suppliers. Intercompany suppliers such as Fujitsu Japan supply our Fujitsu branded products, while WeServ and Fujitsu Consultancy India, among others, support operational services.

Fujitsu Australia transacted with over 1300 third party suppliers (excluding intercompany transactions) with a total annual spend of over \$615M AUD in FY23. Over 95% of our spend was with suppliers located in Australia and New Zealand.

Our suppliers are classified into different tiers to determine suitable candidates for strategic relationships and apply the supplier management process. Supplier segmentation is a systematic way of prioritising our suppliers based on the types of products and services sourced, how much we spend with them and how critical they are to our business.

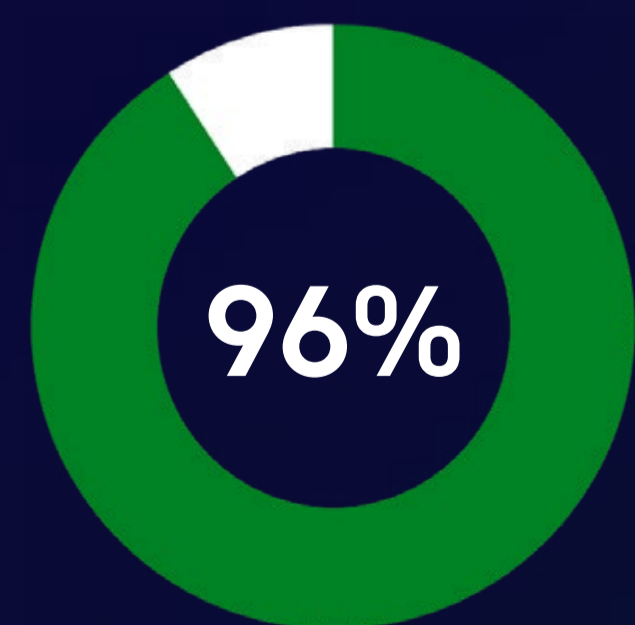
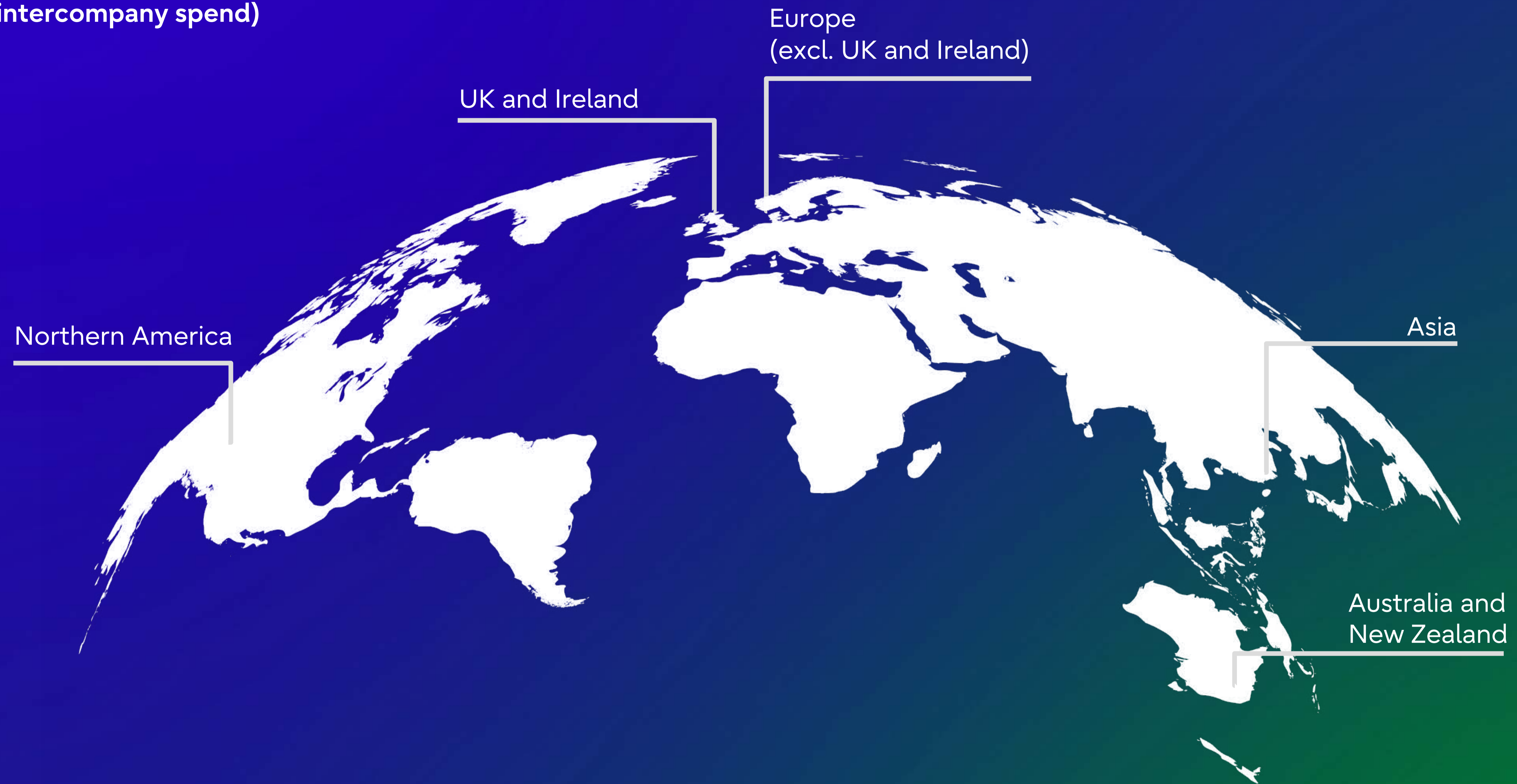
To support our operations and business, we engage with suppliers across a wide and diverse range of industries. Our suppliers are categorised as follows:

Category	Proportion of spend	Summary of category	Primary country sources
Hardware	38%	Computer hardware and IT equipment purchased for resale or to assist Fujitsu Oceania with providing IT services to its customers.	Japan, Germany, China, USA, Australia and New Zealand
Software	11%	Software that is purchased for reselling or licensed to assist the business with the IT services we provide to our customers.	Japan, Europe, USA, Australia and New Zealand
IT Services	18%	IT service suppliers are engaged to support us in delivering business process, application, and infrastructure services to our customers during IT design, build, and run phases.	Australia and New Zealand
Facilities and Property	11%	Cleaning, security, facilities management, maintenance and repair, and waste management.	Australia and New Zealand
Corporate Services	7%	Travel, accommodation, telecommunication, human resources and legal services.	Australia and New Zealand
IT Contractors	11%	Specialist contractors to assist the business with the IT services we provide to our customers.	Australia and New Zealand
Professional Services	3%	Advisory services provided to Fujitsu or its customers.	Australia and New Zealand



# 3<sup>rd</sup> Party Supplier Spend

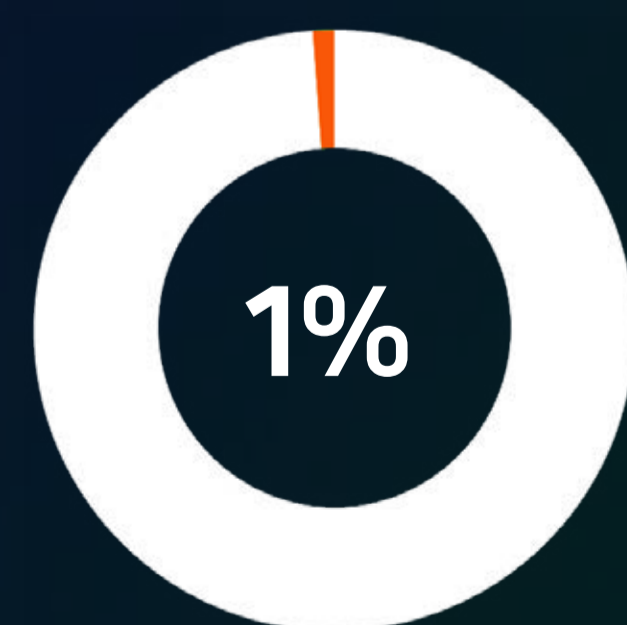
(excluding intercompany spend)



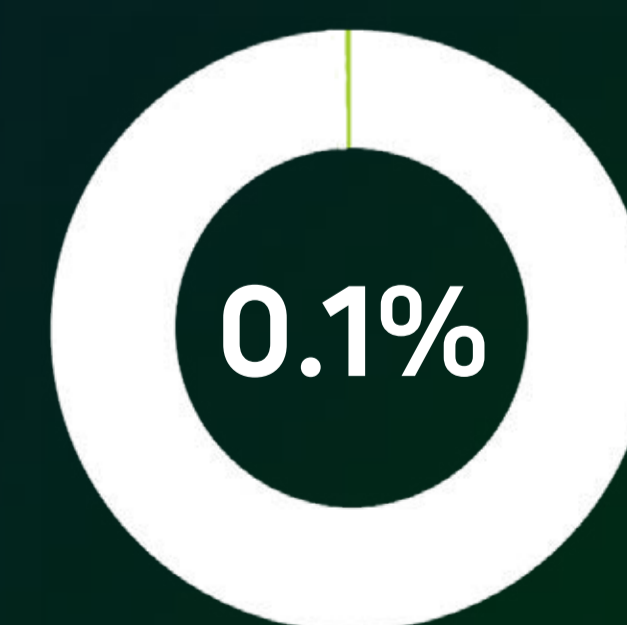
Australia and New Zealand



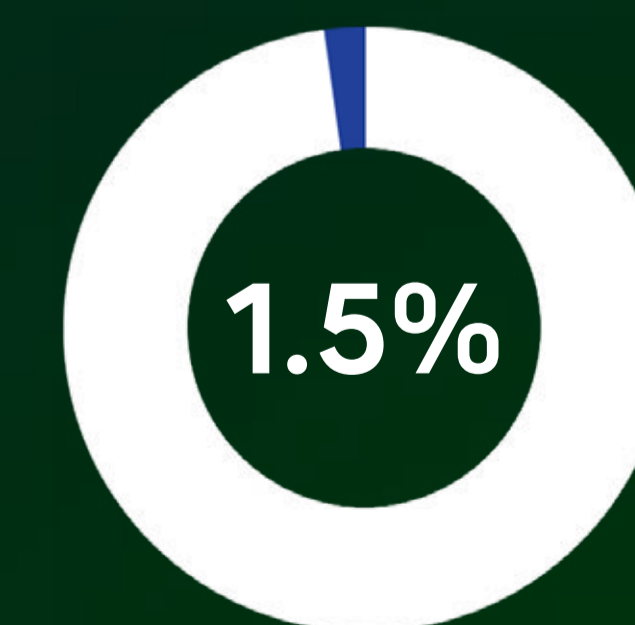
Northern America



UK and Ireland



Europe (excl. UK and Ireland)



Asia

# Fujitsu Procurement Framework

## Procurement Policies

Fujitsu Australia is committed to the highest ethical, environmental, safety and quality standards within our business and in how we engage with our suppliers.

We follow specific procurement policies designed to mitigate and address modern slavery risks when acquiring products and services:

- Fujitsu Australia and New Zealand Procurement Policy
- Fujitsu Global Procurement Policy
- Fujitsu Global CSR Procurement Guideline
- Fujitsu Global Green Procurement Policy
- Fujitsu Responsible Minerals Procurement

We conduct business in a manner that is consistent with these policies and guidelines and requires the same level of compliance and behaviour from all suppliers subject to the applicable laws, rules and regulations of the countries where the business is carried out.



# Fujitsu Procurement Framework

The Fujitsu Supplier Code of Conduct for Corporate Social Responsibility (CSR) incorporates seven principles that all its suppliers must comply with. This Code of Conduct aims to ensure that all businesses that make up our supply chain understand and comply with our policies, principles, commitments, and targets for operating as a leading socially responsible business.

The seven principles are below:



## Human Rights, Labour, Health and Safety

We respect individuals' human rights, does not unfairly discriminate, provide a secure and healthy work environment, do not use child or forced labour, and respect the rights to freedom of association.



## Diversity & Inclusion

We are committed to encouraging diversity in the workplace and the provision of a work environment that is free from discrimination and promotes equal opportunity for all.



## Global Environment

We promote the establishment and implementation of environmental management systems.



## Fair Trade and Corporate Ethics

We promote fair and free competition, proper handling of confidential information, respect intellectual property, prohibit corruption, including bribery and extortion, and ensure the responsible sourcing of minerals.



## Compliance with Laws and Regulations

We comply with applicable laws, regulations and accepted social practices governing our local and global businesses and require the same of our suppliers.



## Assurance of Safety and Quality of Products and Services

We maintain high standards of safety and quality in our products and services.



## Information Security

We maintain and promote information security in order to properly protect our own information and information systems and those of third parties.



# Fujitsu Procurement Framework

The Fujitsu Group is a member of the Responsible Business Alliance (RBA), a coalition of organisations dedicated to advancing Corporate Social Responsibility (CSR). Fujitsu Group's objective is to maintain and strengthen CSR initiatives in our supply chain within the RBA framework. The RBA Code of Conduct has been adopted as the Fujitsu Group's CSR Procurement Guideline.

It is an expectation that our suppliers support the Fujitsu Group CSR Procurement Guideline and conduct their worldwide operations socially and environmentally responsibly.

The Fujitsu Group has a Responsible Minerals Sourcing policy, which sets out Fujitsu Group's commitment to not procure high-risk minerals (tantalum, tin, gold, tungsten and cobalt) from any known conflict sources. Fujitsu expects all its suppliers to adhere to these same standards.

# Risks of Modern Slavery Practices in Operations and Supply Chain

## Within our Operations

As an Information Technology service provider with a predominately professional services workforce, the modern slavery risk assessment result for our internal business operations is low. Fujitsu Australia upholds the National Employment Standards and ensures compliance with all aspects of the Fair Work Act 2009 (Cth) and any industrial instruments, including modern awards, that apply and set minimum entitlements.

## Within our Supply Chain

We understand that Fujitsu Australia may be directly or indirectly exposed to risks because of our activities in general, mainly through our supply chain.





We have outsourced several activities to Fujitsu Global Delivery Centres (GDCs), including support and reporting functions. Though the GDCs are separate legal entities not owned by Fujitsu Australia, we have service agreements in place for all intercompany engagements to minimise risk exposure.

As part of the Fujitsu Group, the GDCs fully comply with Fujitsu Group policies and protocols.

Other areas which we may have modern slavery risk exposures relate to third party engagement and their geographic location:

- Third party supplier modern slavery risks may exist when goods are purchased from suppliers who utilise child labour, forced labour or products that contain materials that were not responsibly sourced.
- Geographic risk may exist where our suppliers have operations or have sourced material from areas where international organisations or non-governmental organisations have documented a high prevalence of modern slavery.
- Lack of visibility down the supply chain continues to present a challenge when assessing modern slavery risks in Tier 3 suppliers and beyond.

## Fujitsu Australia's assessment of category risk rating

Supplier Categories	 Industry Risk	 Product Risk (Conflict Minerals)	 Labour Risk (Services)	 Geographic Risk (Fujitsu Supplier Pool)
<b>Hardware</b> Computer & IT Equipment	High	High	High	High
<b>Software</b> Program Licenses	Low	—	Low	Medium
<b>IT Services</b> Processes, Application, Infrastructure Services	Medium	—	Medium	Low
<b>Facilities &amp; Property</b> FM, Security, Maintenance	Medium	Low	Medium	Low
<b>Corporate Services</b> Travel & Telco, HR, Legal	Low (Medium for telco)	Low (High for telco)	Low	Low
<b>IT Contractors</b> Specialist Contractors	Low	—	Low	Low
<b>Professional Services</b> Advisory	Low	—	Low	Low



# Assessing and Addressing Risks Identified in Our Supply Chain

Fujitsu Australia has an established risk management framework with both pre-emptive and protective measures for identifying, assessing and escalating risks including modern slavery. Our governance structure for managing the Act's compliance obligations is reflected in the table below:

Key roles	Responsibility
<p>Board of Directors of Fujitsu Australia Limited</p>	<p>The Fujitsu Australia Board of Directors is responsible for ensuring that Fujitsu complies with the Act and will ensure that:</p> <ul style="list-style-type: none"> <li>A. appropriate arrangements are in place for identifying and managing the risks of non-compliance with these obligations. The Board of Directors established a Modern Slavery Committee. The board relies on this committee to identify and manage risks of noncompliance with the Act;</li> <li>B. appropriate tone from the top compliance messages are disseminated;</li> <li>C. appropriate structures and compliance processes and measures are in place within the organisation to ensure effective compliance with policies and procedures in accordance with the Modern Slavery Compliance Plan; and</li> <li>D. adequate resourcing and support is provided so that compliance obligations can be met and continuous improvement achieved.</li> </ul>
<p>Modern Slavery Committee</p>	<p>Fujitsu has a Modern Slavery Committee which meets quarterly to ensure compliance with the Act. The Modern Slavery Committee comprises representatives from Procurement, Risk, Legal &amp; Reputation, and Purpose, People &amp; Culture.</p> <p>The Modern Slavery Committee's role and responsibility is to assist the Head of Procurement by supporting the processes and procedures in place to assess compliance with the key reporting requirements under the Act.</p>
<p>Head of Procurement &amp; Head of Compliance</p>	<p>The Head of Procurement provides leadership on managing compliance with the Act and has access to senior decision makers at all levels of Fujitsu. The Head of Compliance advises the Head of Procurement on the Act.</p>

We incorporate a multi-level strategy to identify, analyse and mitigate modern slavery threats in our supply chain.

The first level requires the evaluation of all new suppliers prior to their acceptance as a supplier to Fujitsu Australia. We have a Third-Party Due Diligence (3PDD) procedure, which is a web-based platform with multiple levels of approval in analysing and signing off on a potential supplier. As part of the 3PDD procedure, the potential supplier must complete a questionnaire that includes questions meant to identify potential compliance risks, such as modern slavery issues. Fujitsu will only transact with a supplier that has completed the 3PDD procedure and has passed the mandatory minimum requirements.

The SAP Ariba system was developed to monitor all suppliers and manage ongoing activities with effective relationship management with all vendors. With the newly developed ServiceNow-based risk register, the tool will be used for recording all risk incidents and concerns identified (whether significant or not), along with details about the concerns (or likely concerns), determinations, reporting, remediation action and progress.

The second level requires all suppliers to sign an agreement with Fujitsu which includes a provision that all new suppliers comply with the Act and refrain from engaging in any activity, practice, or conduct that would constitute modern slavery under the Act.

Fujitsu supplier contracts also provide Fujitsu the right to conduct onsite audits and terminate the agreement based on non-compliance with the Act. As part of the on-boarding process, suppliers agree to accept Fujitsu's Supplier Code of Conduct for Corporate Social Responsibility. Fujitsu has a supplier management framework in place to continuously monitor suppliers throughout the duration of their contractual relationship.

The third level of our strategy incorporates responses to our Supplier Risk Assessment Questionnaire to assess, analyse and mitigate risk in our supply chain. Our previous modern slavery assessment has been fully embedded into this Supplier Risk Assessment Questionnaire to address business critical risk items including supplier compliance with Fujitsu policies, cyber security practices, privacy and confidentiality and business continuity while maintaining its strong focus on modern slavery and supply chain disclosure.

Along with the Supplier Assessment Risk Questionnaire, we include a Modern Slavery Awareness Pack to educate suppliers on modern slavery risks and importance putting processes in place to assess and address any potential risk of modern slavery practices in their supply chain.

Fujitsu encourages a culture of openness in which anyone can raise concerns about our business. We have a Whistleblower Policy which allows current or former employees and third parties to anonymously report concerns to certain senior people in Fujitsu Australia, or by phone or online to Fujitsu Alert. Any concerns about modern slavery in our operations or supply chain can also be reported via the process outlined in the Whistleblower Policy.

Any whistleblower who makes an eligible disclosure (e.g., where the whistleblower has reasonable grounds to suspect misconduct or an improper state of affairs in Fujitsu Australia) will be protected from any detrimental acts or omissions, including victimisation. Our whistleblowing program can be found [here](#).

# Supplier Risk Assessment Questionnaire

For this reporting period, we expanded the scope of risk assessment to include our ASEAN business and engaged around 750 suppliers across the APAC region to undertake a Supplier Assessment Risk Questionnaire. Suppliers received the questionnaire, along with the updated Fujitsu Global Human Rights Statement, and Fujitsu Modern Slavery Presentation to raise awareness and provide education on modern slavery and its related risks.

Our FY2023 Modern Slavery Questionnaire was reviewed and updated in relevant areas, primarily focusing on assessing and analysing potential risks associated with following key topics:

- If supplier had reported or been convicted of any human rights breaches including in relation to modern slavery and / or labour standards.
- Whether the supplier has a Modern Slavery Statement, Modern Slavery Policy, or other policies in place to combat associated risks.
- Does the supplier have operations or major suppliers in any countries identified as high risk for modern slavery, including Bangladesh, China, Democratic Republic of Congo, Ethiopia, India, Myanmar, Nigeria, Pakistan, Russia and Thailand.

- Does the supplier produce or provide goods and services known to have a high modern slavery risk factor.
- Whether the supplier performs any type of due diligence when engaging with a new supplier that considers the potential presence of all forms of modern slavery, including human trafficking, slavery and forced labour, particularly if supplier has operations or supply chains in high modern slavery risk countries.
- Does the supplier have a whistleblowing policy and / or process for reporting modern slavery or human rights concerns.

## Fujitsu Australia and New Zealand Supplier Questionnaire

Over 600 in-scope suppliers (approximately 92%) who account for 88% of our third-party supplier spend in Australia and New Zealand completed the questionnaire. 130+ suppliers reported they have their own Modern Slavery Statement to be lodged with the Attorney General's Department.

Of responses received:

- No suppliers reported having any convictions of human rights breaches including modern slavery.
- 85% of our suppliers stated that they do not provide goods or services that are known to have a high modern slavery risk factor.
- Of those that do provide goods or services with a high modern slavery risk factor, 81% have policies or procedures in place to combat modern slavery risks. Fujitsu will work with the remaining suppliers to uplift their compliance and mitigate this risk.
- 87% of our Critical and Major suppliers disclosed they perform some form of due diligence when engaging new suppliers and/or have systems in place to regularly assess their suppliers for potential modern slavery risks. Fujitsu will work with remaining suppliers to improve its supply chain risk management and control.
- 93% of the suppliers responded that they do not procure products containing minerals that could potentially be derived through conflict sources.
- All but 1 supplier who reported that they procure products that contain minerals that could potentially be derived through conflict sources, expressed that they have a Conflict Minerals Policy or other policy on Responsible Minerals Sourcing in place. We will work with this supplier to ensure appropriate controls are in place for this risk.
- As part of our continuous improvement focus, we continue to work with our small and minor suppliers to assist them in endorsing the Modern Slavery Act and enact further risk management initiatives to reduce our supply chain's exposure to modern slavery risk.

## Tier 2 Suppliers

Forced labour or child labour may be present depending on geographic location of suppliers. Using the [Transparency International's Corruption Perceptions Index](#), over 95% of our third-party supplier spend are with countries located in low-risk areas.

Around 80 suppliers disclosed that either they have operations or suppliers (Tier 2) in high-risk countries. All Critical and Major suppliers have due diligence process and controls in place in assessing the presence of modern slavery in their supply chain, thus lowering Fujitsu's risk exposure.

We used, and continue to use, this intelligence to minimise the risk of modern slavery in our supply chain. We have leveraged, and will continue to leverage, our membership with RBA to develop our approach to modern slavery.

## ASEAN Supplier Questionnaire

The ASEAN engagement marks the first supplier risk activity in the region with a focus on modern slavery. Results from this outreach will help inform the risk profile of our ASEAN supply chain and assist in improving engagement with partners in the region to mitigate risk of any potential presence of modern slavery.

From the preliminary analysis, no suppliers reported having any convictions of human rights breaches including modern slavery.

Future activities will utilise the questionnaire responses to develop a roadmap on how to educate and uplift ASEAN supplier capability to more effectively mitigate modern slavery risks specific to this region.

# How Fujitsu Australia will Assess the Effectiveness of these Actions

Fujitsu has assessed and updated our Supplier Management Framework to identify, assess, mitigate, and monitor potential risk areas of modern slavery, including human trafficking. We have undertaken a gap analysis of our current policies and practices and updated accordingly to further align with our Enterprise Risk Management framework.

In addition to the eProcurement platform SAP Ariba which has been deployed for assessing and monitoring supplier risk, Fujitsu utilises our ServiceNow based risk register tool to record, track and report risks. Risk Management workshops have been established to review, update and assess progress and effectiveness of any remediation actions.

After evaluating responses to the Modern Slavery Questionnaire, we have noted several actions, particularly following up with suppliers who have supply chains in higher risk countries for modern slavery without presence of due diligence policies and processes.

We will also work with suppliers to encourage, improve their modern slavery risk management framework and check in with them periodically on progress on any actions they may put in place to address modern slavery risks.

Utilising our category risk rating assessment, we will prioritise engagement with suppliers at high-risk of having modern slavery practices take place in their supply chain by:

- Industry Risk & Labour Risk: Focusing on hardware suppliers, followed by suppliers categorised under IT Services and Facilities & Property.
- Product Risk: Through sourced hardware and telco products.
- Geographic Risk: Predominantly hardware and software providers located in high-risk countries.
- Criticality to Business Operations: Criticality of each supplier is determined by policy and supplier segmentation procedures which aims to estimate our risk exposure from individual supplier operations.

We continue to undertake audits on supplier policies and procedures which include key labour practices and review how we can effectively use these audits to mitigate any risk identified and improve the process in line with industry practices.

Where any issues are found, an action plan is formulated and agreed. Since the introduction of the Act, to mitigate modern slavery risks in Fujitsu Australia's operations, we regularly review and update our Recruitment and Procurement policies to:

- ensure we comply with the Act,
- entrench Human Rights in our procurement and acquisition processes, and
- work with the supplier and put a remediation process in place where we identify a suspected situation of modern slavery in our supply chain.

# Key Milestones from Last Year

Between 1 April 2023 to 31 March 2024 (FY23), we:

- ✓ Continuously worked with all suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- ✓ Launched our first APAC-wide Supplier Assessment activity including modern slavery assessment.
- ✓ Developed ASEAN specific modern slavery education material for suppliers in this region.
- ✓ Introduced the Fujitsu Ethical Sourcing Program by incorporating responsible sourcing standards / guidelines into our Procurement Policy, including mandating a modern slavery risk assessment into sourcing evaluation process.
- ✓ Provided input into the broader Fujitsu Oceania Environmental, Social and Governance Framework.
- ✓ Created a ServiceNow based Modern Slavery Risk Register, conducted regular reviews for remediation actions and measure how we are progressing.
- ✓ Developed a risk dashboard to increase the transparency of human rights risks across our supply chain.
- ✓ Spot audited 30 suppliers to ensure compliance through a review of their policies and procedures.
- ✓ Conducted a collaboration session with critical suppliers who have operations across the APAC region.
- ✓ Conducted a Tier 2 supply chain analysis for selected suppliers to ensure compliance with the Act and assess any modern slavery risks.

# Update on our 3-Year Plan

Between 1 April 2024 and 31 March 2025 (FY2024), we will:

- Continuously work with all suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Collaborate with Fujitsu entities globally to adopt best practice on modern slavery prevention . Expand the Modern Slavery Risk Management Framework to cover the broader Asia Pacific region.
- Expand the Supplier Assessment scope to a greater number of suppliers in ASEAN.
- Review and update the Fujitsu supplier training pack on modern slavery for the Australia-New Zealand region.
- Broaden stakeholder engagement across our controlled entities, other organisations, and civil society, collaborating with Fujitsu's major customers to promote best practice.
- Encourage Fujitsu suppliers to mandate modern slavery requirements in their internal procurement process.
- Review and uplift our human rights-related policies, where required.
- Review and enhance our approach to complaints and grievance mechanisms for our operations and within our supply chain.

Between 1 April 2025 and 31 March 2026 (FY2025), we will:

- Continuously work with all suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Conduct the Supplier Assessment activity online through Fujitsu's e-Procurement platform, providing improved efficiency, automated reporting, and lowering onus on suppliers to provide information.
- Update modern slavery training for Fujitsu employees and expand content to the APAC region.
- Include modern slavery as a key topic during Fujitsu Compliance Week.
- Expand the Ethical Sourcing Program to ASEAN countries to include modern slavery considerations within their sourcing processes.
- Investigate incorporating modern slavery risk assessments during new supplier onboarding.
- Review and enhance the modern slavery clauses within contracts to ensure compliance and disclosure for suppliers Tier 2 and beyond.
- Explore market leading tools and platforms to automate the risk management process for modern slavery. Improve Fujitsu online tools by enhancing both the usability and the information available.

Between 1 April 2026 and 31 March 2027 (FY2026), we will:

- Continuously work with all suppliers to assess modern slavery risk by conducting ongoing assessments as part of Fujitsu's Supplier Management Framework and risk management activities.
- Collate business policies and processes regarding human rights and modern slavery into a single policy document Modern Slavery Policy to govern supplier engagements.
- Collaborate with key suppliers on a Tier 3 and beyond mapping activity and build upon common processes to improve reporting and disclosure.
- Investigate the implementation of minimum modern slavery standard requirements for key contracts and sourcing activities as part of the Ethical Sourcing Program.
- Mandate all employees undertake modern slavery training.
- Conduct a market analysis to understand best industry practice and identify opportunities to further improve on modern slavery risk mitigation as well as potential future collaboration activities with suppliers and customers.

# Consultation with Reporting and Owned Entities

This Statement was developed through a Fujitsu Australia group-wide consultation process, involving the reporting entity covered by the Statement and owned entities across the Group.

All owned entities have been consulted and made aware of modern slavery risks in preparation of this consolidated statement. Owned entities share the common stance against modern slavery and comply with Fujitsu Australia's policies, processes and protocols.

Any modern slavery risks specific to owned entities industry and operations have been identified, assessed and mitigation processes where applicable, have been put into place. Owned entity directors have been engaged, contributed to and endorse entity inclusion in this Modern Slavery Statement. A final draft of the Statement was provided to all relevant entities before publication.

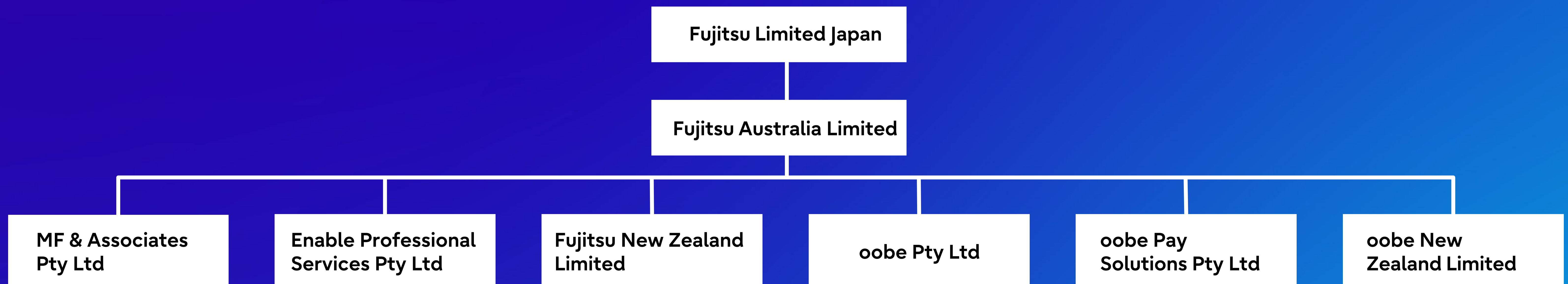
In addition to developing the Statement, all entities in the Group work together continuously to implement and monitor our modern slavery risk management approach, including supply chain assurance activities.

## Our Consultation Process

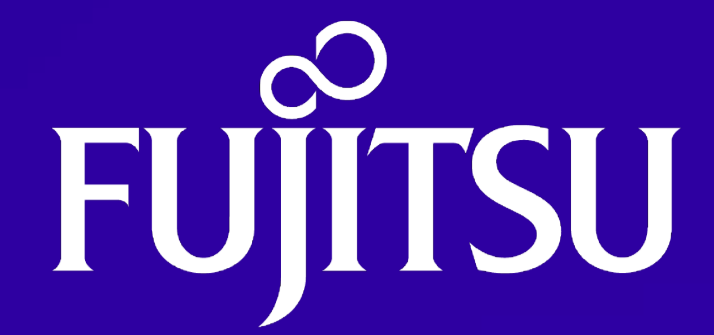
The Procurement team led the Group-wide consultation to develop this Statement. This process involved key teams responsible for managing potential modern slavery risks in our operations and supply chains, including Procurement, Legal, Compliance, Purpose, and Risk functions. These teams provided input and reviewed a draft before publication.

The VP Legal & Reputation and Modern Slavery Committee members reviewed the Statement before it was approved by the Board. This cross-functional consultation ensured the Statement reflects our Group-wide approach to modern slavery and supports ongoing engagement from key internal stakeholders. All owned entities within the scope of this Statement were consulted on the draft at the Director and Company Secretary levels.

A list of reporting and consulted entities can be found in Page 4 of the Statement.







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