

# Europe Security Master Policy

## **Master Policy Statement**

Fujitsu Europe operates in a business environment, which requires that:

- As individuals, we adopt a culture that minimizes the security risks to our people, assets and business activities.
- As an organization we have an effective security management and governance framework that allows Fujitsu Europe to take informed business decisions to successfully manage security risk.
- As an organization, we are committed to preserving the confidentiality, integrity and availability of all information assets.

This Master Security Policy (Security Policy) is the foundation of Fujitsu Europe Information Security Management System (ISMS) and the objective is to deliver an effective and managed approach to security across our business. The Security Policy Manual is a single set of mandatory minimum principles in support of this Policy underpinned by the Minimum Security Controls Framework (MSCF).

This Policy is fully aligned with the Fujitsu Global Security Policy, to ensure that all regional security requirements, controls, and governance practices are consistently applied across the Fujitsu Group.

To ensure the importance of this policy is communicated uniformly throughout Europe, all members of the Regional Executive Leadership discuss and ratify, at least annually, this Policy as it aligns with and relates to the Regions strategic aims, legal privacy protection, regulatory compliance, and information protection obligations.

## **Authority & Accountability**

The Europe CEO (Head of Europe Region), Risk Management Committee and members of the Europe Leadership team have ultimate responsibility for security.

The Europe Region Risk Management Committee delegates its risk responsibilities to the Enterprise Risk Management Board (ERMB) and through the ERMB to the Security Management Forum, and the CISO Security Governance function.

The ERMB is responsible for ensuring that Fujitsu Europe has an effective approach to risk management, governance and compliance. For security risks, the ERMB members are responsible for ensuring that an effective overall risk management approach is adopted in all the operating areas of Fujitsu Europe (divisions, business functions and business lines). This approach must embed responsibility and accountability within the operational structure of Fujitsu Europe.

### **The Policy Owner shall:**

1. Ensure that all relevant Employees are aware of and, where appropriate, trained in the operation of this Policy and any changes to it.
2. Ensure that any changes to the Policy or its associated Processes are duly authorized by the Security Management Forum.
3. Be responsible for developing, maintaining, disseminating, and measuring compliance with this Policy.

4. Submit a regular report on the effectiveness of this Policy to the Corporate Governance, Risk Management Committee.
5. Ensure that Processes are specified and maintained to enable Fujitsu to achieve its strategic objectives in respect of this Policy.

### **Employees:**

Each Employee in the organizations to which this Policy is applicable must comply with this Policy, the Security Policy Manual, and associated Processes, security controls, standards and guidelines that are published in the EBMS and Ask Security. Any Employee found to be in breach of any Policy, or any employee who neglects personal security responsibilities as laid down in the Global Business Standards, may be subject to disciplinary proceedings that may lead to dismissal. It is the duty of all employees to report any actions or conditions that appear to violate the Security Policy and Security Policy Manual.

### **Applicability**

This Policy applies to Fujitsu operations in Europe. This means that all Employees, Contractors, Working Partners and businesses carried on by Fujitsu Services Holdings PLC, Fujitsu Technology Solutions (Holding) BV and their subsidiaries, whether they be incorporated within Fujitsu Europe or not, and any other company or organization that is managed by the Heads of Europe Region, except to the extent, if any, stated under Exemptions below, must comply with it.

### **Scope**

The Scope of the Policy covers all employees within the Company in Europe.

### **Definitions**

"Company" means Fujitsu Limited and relevant Fujitsu Group companies.

"Organization" means a unit that carries out quality activities in business and operations. This includes divisions, companies, and units covering multiple companies such as regions.

"Employees" mean directors, officers, and employees of the Company.

"Products and services" mean the following:

(1) Products and services (including system integration, professional services, etc.), their accompanying items, and the facilities required to provide the services.

(2) Internal IT systems built within each Company, and their operations and maintenance