

# Europe Procurement *Regional* Policy

Policy Reference Number: EMP 009

## 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

## Policy Statement

- The primary mission of the Procurement Unit is to contribute to Fujitsu’s business by securing supply of required goods and services and by achieving cost savings, whilst minimizing the associated risks.
- Procurement owns the supplier selection strategy, identifying preferred suppliers and agreements which will be used to satisfy both Customer and Fujitsu requirements.
- Procurement are responsible for both commercial and contractual negotiation with suppliers and will manage the review and recording of appropriate approvals.
- Where a preferred supplier or catalogue is available for the goods or services being procured, then the purchase must be made using the preferred supplier or catalogue as appropriate.
- Regardless of value, all new third-party suppliers must be approved by Procurement prior to any commitment being made.
- Before a supplier is added to any Fujitsu ERP system it must undergo, and be approved by, the appropriate due diligence process. Procurement may require existing suppliers to undergo further due diligence as necessary.
- No commitment should be made to any third party unless the expenditure has been approved by the relevant region and/or country Governance processes.
- All third-party commitments must be covered by a purchase order and associated terms and conditions, unless listed in the exemptions section of the ‘Europe Country Specific Thresholds and Exceptions’ document.
- Europe Procurement must be engaged for any framework agreement or at the point at which expenditure is identified as being likely to exceed the aggregate annual thresholds as listed in the ‘Europe Country Specific Thresholds and Exceptions’ document.
- Bid teams must always engage with Procurement for any opportunities with a total contract value of €15 million or greater and which involve third party suppliers.

## Europe Procurement Regional Policy

- All business shall be conducted in accordance with Fujitsu's standard terms and conditions of purchase applicable in the region where the business is being transacted. Procurement and Legal must approve any exceptions.
- All Fujitsu Europe employees (including contractors) conducting any business with any third-party supplier must act ethically, fairly, and consistently and comply with the Fujitsu Global Business Standards.
- Strategic third-party suppliers, as agreed by the Europe Head of Procurement, are managed by Procurement. In other instances, the contractual and obligation management of third-party suppliers is managed by the appropriate account team, or Service Line/Capability Unit. However, contractual issues must be escalated to Procurement.

## Scope

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 Head of Europe Region, except to the extent, if any, stated under Exemptions below, must comply with it.

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

## Exemptions

Where the third party appears in the 'Europe Purchase Order Exceptions List' document for the country in which the business is being transacted, a purchase order is not required.