

# Respecting Human Rights

Fourth Modern Slavery Statement for the  
reporting period 1 April 2022- 31 March 2023

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 share Fujitsu Australia's fourth Modern Slavery Statement, it's been encouraging to reflect on the maturity we're building year on year.

Our newly refreshed Human Rights statement speaks strongly to our commitment to respect the human rights of all employees, supply chain partners, customers and end users of our products and services in broader society. This is a vital aspect of being an inclusive employer of choice and our customer's trusted digital transformation partner.

For Fujitsu, FY22 (April 2022 to March 2023) has been a year of expanding our circle of influence, as we continue to increase capability and work collaboratively within our ecosystem. We engaged with more suppliers than ever before, close to 700 suppliers in total which accounts for 92% of our third party supplier spend. We've also been working quickly to include the operations and supply chains of all our newly acquired companies, to ensure we are consistent in our message.

95% of Fujitsu Australia's supply chain spend is based in Australia and New Zealand. It is important we don't overlook this aspect of our supply chain. As we know from Walk Free's recent 2023 Modern Slavery Index, that on any given day in 2021, 41,000 people are victims of modern slavery in Australia, a staggering increase of 173% when compared to the 2018 index. We're pleased to report none of our suppliers reported having any convictions of human rights breaches, including modern slavery and a majority of our critical and major suppliers have due diligence and modern slavery risk management processes in place.

As we look to the year ahead, we've been preparing to embed our Supplier management framework into our Enterprise risk management framework so that we can leverage a highly integrated, automated and data driven approach to Modern Slavery risk management and focus our efforts on our most material risks.

I invite you to read more of this year's key highlights and updates to our ambitious 3-year plan to see how respect for human rights and zero tolerance to modern slavery is instrumental to Fujitsu being able to deliver on its purpose to make the world more sustainable by building trust in society through innovation.

The Board of Fujitsu Australia Limited have approved this Modern Slavery Statement on the 30th of August 2023.

A handwritten signature in black ink, appearing to read 'Graeme Beardsell', with a long, sweeping underline.

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

# 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 118 Talavera Road, Macquarie Park, New South Wales.

## Owned Entities and Consultation with Entities

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

### **Fujitsu New Zealand Limited**

### **InPhySec Security Limited**

Subsidiarie(s): InPhySec UK Limited.

### **Enable Professional Services Pty Ltd**

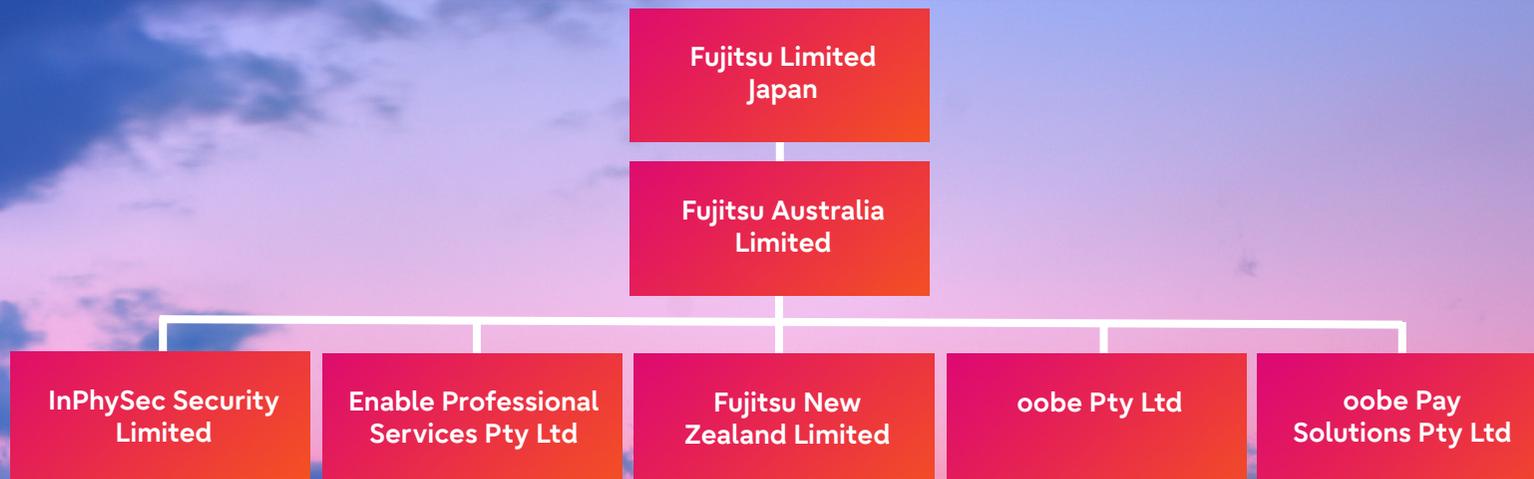
Subsidiarie(s): Enable Labs Pty Ltd, Enable Professional Services (Pte.) Ltd (Singapore), Enable Professional Services Limited (Hong Kong), Enable Professional Services Incorporated (Philippines), Enable Professional Services Private Limited (India).

### **oobe Pty Ltd**

Subsidiarie(s): Informed Future Pty, oobe New Zealand Limited

### **oobe Pay Solutions Pty Ltd**

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.



# Organisational structure

Fujitsu Australia is a wholly owned subsidiary of Fujitsu Limited, a company incorporated and headquartered in Tokyo, Japan. Fujitsu Limited was founded 86 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 2023, Fujitsu Limited and its 364 consolidated subsidiaries and 20 affiliates throughout the world, including Fujitsu Australia (Fujitsu Group), employs more than 130,000 people who help our customers in 180 countries. Fujitsu Limited reported consolidated revenues of 3.7 trillion yen (\$28B USD) for the fiscal year ended March 31, 2023. The Fujitsu Group Integrated Report can be found [here](#).

Fujitsu Australia is the primary trading entity of Fujitsu operating in Australia and New Zealand. The consolidated revenue for Fujitsu Australia and its controlled entities was \$1.1B AUD for the fiscal year ended 31 March 2023.

We have over 3,500 employees working across different domains and have 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



**+3,500**

staff



**+50 years**

of innovation



**39 partners**

4 global and  
35 regional



**+43,000**

square metres of data  
centre floor space



**Leader**

one of the leading ICT  
companies in Oceania



**\$4.1M**

spent more than \$4.1M  
with First Nations owned  
businesses since 2017



**6<sup>th</sup>**

largest IT services  
provider in Australia  
and New Zealand



# 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>     | <b>Our purpose is to make the world more sustainable by building trust in society through innovation.</b>  |   |
| <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 more.
- Our commitment to respect for human rights of all officers and employees, our supply chain, customers and end users of our products and services, such as 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.

The implementation of this statement is overseen by the Sustainability Management Committee, chaired by Fujitsu's CEO, who meet every six months to track our progress and discussed at a regular cadence with regions within the group. Outcomes are reported to the Executive Management Council and Board of Directors of Fujitsu Limited.

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.



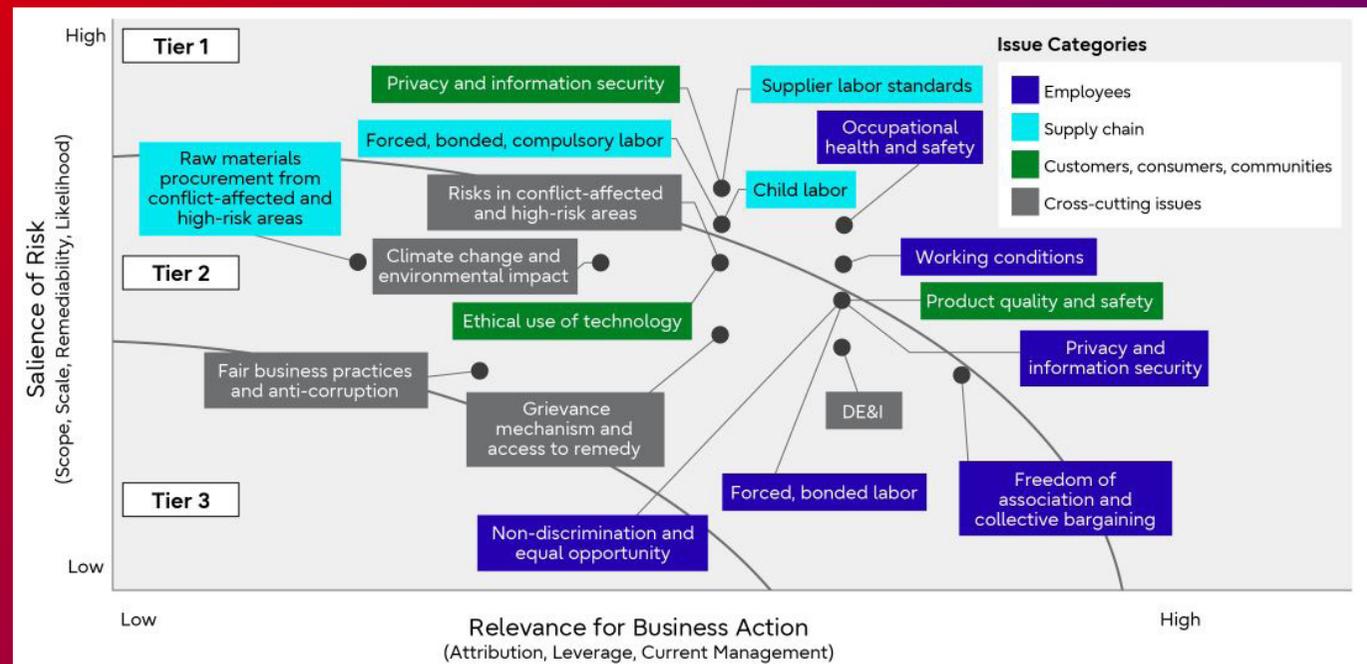
### Anti-Corruption

**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. This involves a comprehensive approach, where we evaluate and address material Human Rights concerns on a global scale. Our goals are centred around our aspirations for Fujitsu, which encompass various initiatives such as providing continuous Human Rights e-learning to over 90% of our global workforce, actively engaging in meaningful stakeholder dialogues, and collaborating with reputable NGOs (Non-Government Organisations).

In 2022 we enlisted the cooperation of Business for Social Responsibility (BSR), an international NPO (Non-Profit Organisation), which undertook a Human Rights Impact Assessment for Fujitsu Group management and businesses from a third-party perspective. As well as conducting interviews with each of the Fujitsu Group regions, Corporate Divisions and Business Groups, BSR employed desktop research and analysis of submitted documents to compile a list of human rights issues. They then ranked the issues according to their levels of severity, likelihood and correlation with businesses.

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



# Our operations

Fujitsu Australia is a leading service provider of business, information technology and communications solutions. We work with our customers throughout Australia and New Zealand to consult, design, build, operate and support business solutions. We provide strategic consulting, as well as application and infrastructure solutions and services. We specialise in managed infrastructure services, Software as a Service (SaaS), development of Artificial Intelligence with clients, cloud services, architecture and consulting, desktop-related services, cyber security, application services, co-creation solutions, business and technological solutions, and data centre services. We also supply a range of products including PCs, workstations, monitors, point of sale devices, scanners and software.

As part of Fujitsu's continuous expansion strategy, we have acquired Versor, oobe, InPhySec and Enable in recent years.

- **Fujitsu Data & AI**, is a data analytics specialist management consultancy company. Formally known as Versor, Fujitsu Data & AI is now fully integrated with Fujitsu Australia as One Fujitsu, effective April 1, 2023.
- **oobe**, a digital security solutions provider with product portfolio that spans modern workplace, desktops, apps, data, cloud and cyber.
- **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.
- **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.

All new businesses will adopt our governance framework, follow the same modern slavery protocols and comply with our promises to eradicate any Modern Slavery practices where possible and uphold human rights compliance.

We outsource several of our functions to Global Delivery Centres (GDCs), WeServ, Philippines and Fujitsu Consulting 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 comprises of both intercompany and third-party suppliers. Among the intercompany suppliers are Fujitsu Japan, responsible for providing Fujitsu branded products, and WeServ and Fujitsu Consulting India, which play crucial roles in supporting our operational services.

We transacted with over 1300 third party suppliers with a total annual spend \$650M AUD in FY22 (excluding intercompany transactions). 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.

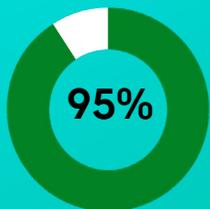
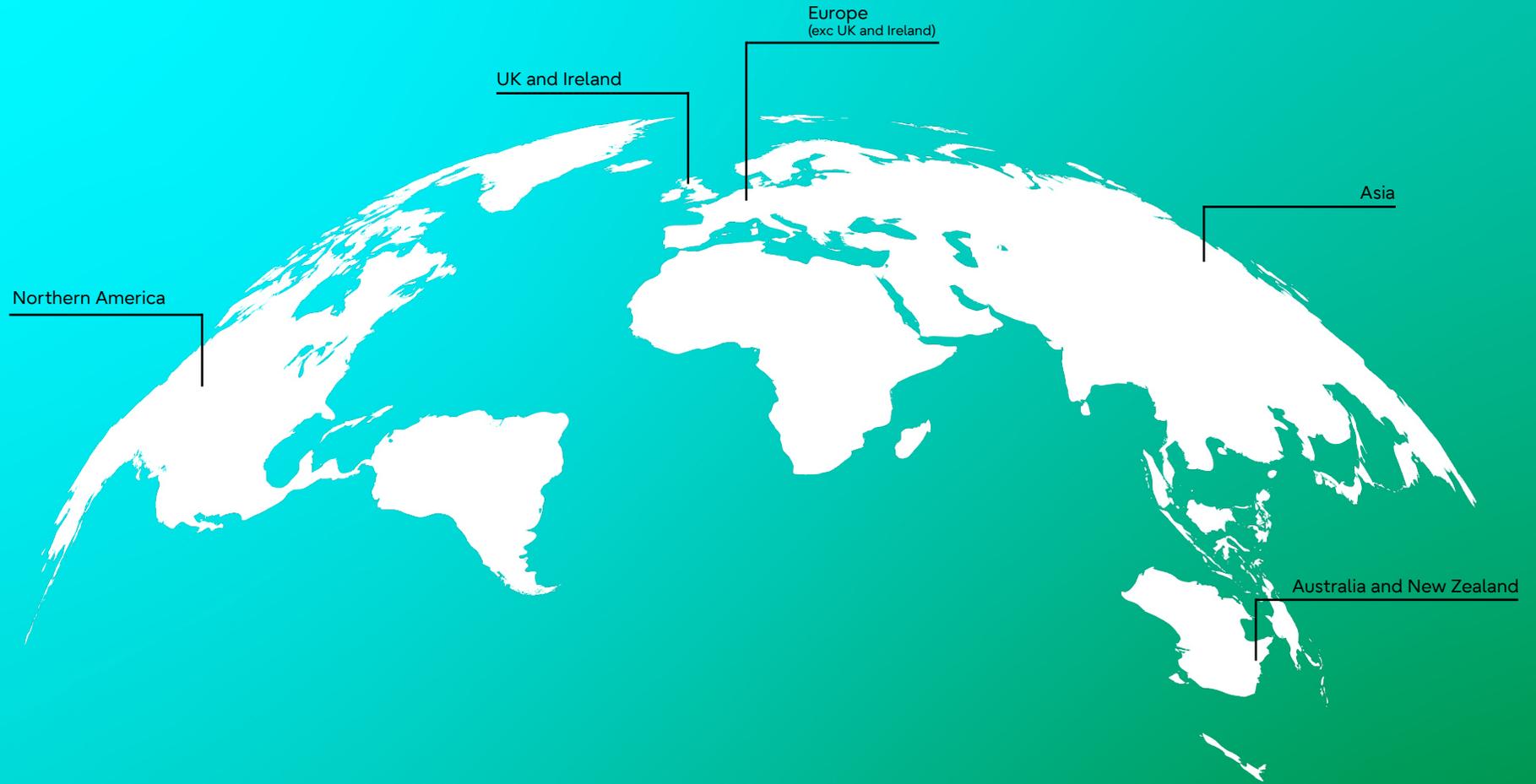
To support our operations and business, we engage with suppliers across a wide and diverse range of industries. Our suppliers are categorised as follows:

1. **Hardware** – this includes computer hardware and IT equipment purchased for resale or to assist us with providing IT services to our customers. This hardware is predominantly purchased from Japan, Germany, China, USA, Australia and New Zealand.
2. **Software** – this includes software that is purchased for reselling or licensed to assist the business with the IT services we provide to our customers. Software is predominantly purchased from Japan, Europe, USA, Australia and New Zealand.
3. **IT Services** – other than Hardware and Software suppliers, 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. IT service suppliers are predominantly sourced within Australia and New Zealand.
4. **Facilities and Property** – this includes cleaning, security, facilities management, maintenance and repair, and waste management. Predominantly sourced in Australia and New Zealand.
5. **Corporate Services** – to support the running of our business, including travel, accommodation, telecommunication, human resources and legal services. Predominantly sourced and engaged within Australia and New Zealand.
6. **IT Contractors** – specialist contractors to assist the business with the IT services we provide to our customers. Predominantly purchased from Australia and New Zealand.
7. **Professional Services** – this includes all advisory services provided to us or our customers. Predominantly purchased from Australia and New Zealand.

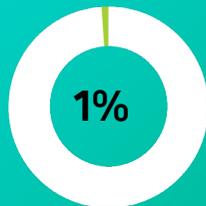


# 3rd Party Supplier Spend

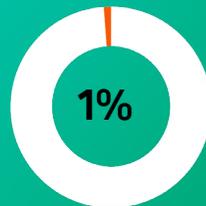
\*excluding intercompany spend\*



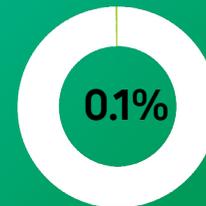
Australia and New Zealand



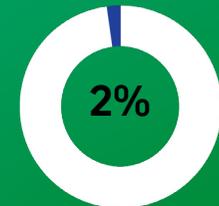
Northern America



UK and Ireland



Europe  
(exc 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, do 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). The 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 our CSR Procurement Guideline and conduct their worldwide operations socially and environmentally responsibly.

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



# Risks of Modern Slavery Practices in operations and supply chain

As an Information Technology service provider with a predominately professional services workforce, the modern slavery risk assessment result of 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 may cover our staff minimum entitlements.

We understand that we 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 with all intercompany engagement 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.

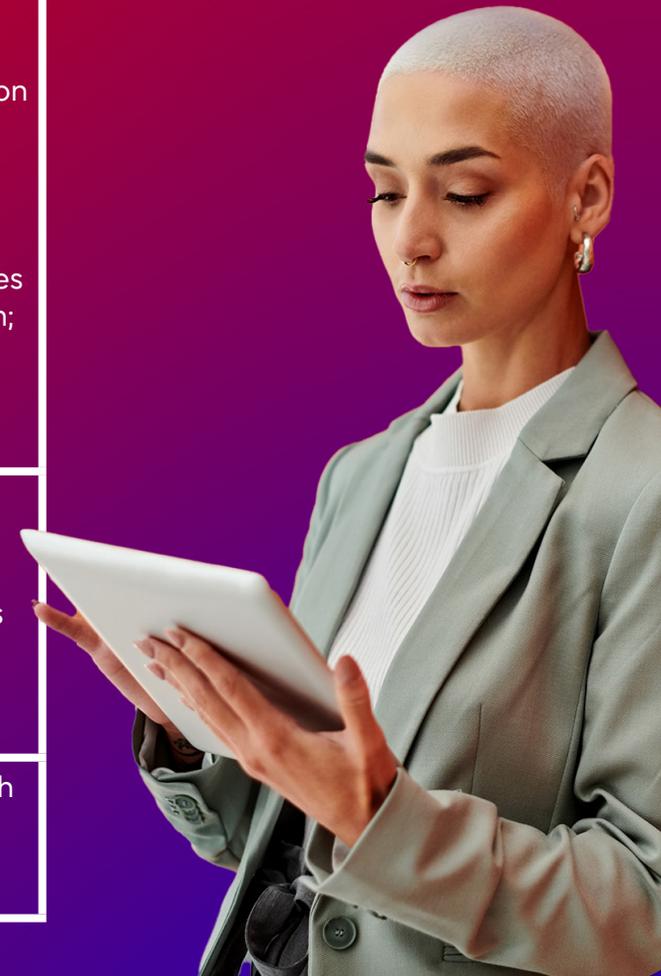
## Fujitsu Australia's assessment of category risk rating

| Supplier categories  | <br>Industry Risk | <br>Product Risk<br>(Conflict Minerals) | <br>Labour Risk<br>(Services) | <br>Geographic Risk<br>(Fujitsu Supplier Pool) |
|--|--|--|--|---|
| Hardware<br>Computer & IT Equipment                          | High   | High   | High   | High  |
| Software<br>Program Licenses                                 | Low  | —  | Low  | Medium  |
| IT Services<br>Process, Application, Infrastructure Services | Medium   | —  | Medium   | Low   |
| Facilities & Property<br>FM, Security, Maintenance           | Medium   | Low  | Medium   | Low   |
| Corporate Services<br>Travel & Telco, HR, Legal              | Low<br>(Medium for Telco)  | Low<br>(High for Telco)  | Low  | Low   |
| IT Contractors<br>Specialist Contractors                     | Low  | —  | Low  | Low   |
| Professional Services<br>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   |
|---|--|
| Board of Directors of Fujitsu Australia Limited | <p>The Fujitsu Australia Board of Directors is responsible for ensuring that Fujitsu complies with the Act and will ensure that:</p> <ol style="list-style-type: none"><li>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>appropriate tone from the top compliance messages are disseminated;</li><li>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>adequate resourcing and support is provided so that compliance obligations can be met and continuous improvement achieved.</li></ol> |
| Modern Slavery Committee                        | <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; Compliance, and Purpose, People &amp; Culture. 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>   |
| Head of Procurement & Head of Compliance        | <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 us. 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. We 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/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 us which includes a provision that all new suppliers comply with the Act and refrain from engaging in any activity, practise, or conduct that would constitute modern slavery under the Act. Our supplier contracts also provide us 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.

We have 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 Modern Slavery Questionnaire to assess, analyse and mitigate risk in our supply chain. For this reporting period and for the first time, the questionnaire was imbedded into our Supplier Assessment Risk Questionnaire which also included areas such as cyber security, privacy and confidentiality and business continuity however with a strong focus on Modern Slavery.



For this reporting period, we expanded our scope and engaged around 700 suppliers, including newly acquired business suppliers, to undertake a Supplier Assessment Risk Questionnaire. Suppliers received the questionnaire, along with our updated Global Human Right Statement, and Modern Slavery presentation to raise awareness and provide education on Modern Slavery and its related risks.

Our FY2022 Modern Slavery questionnaire was reviewed and updated in relevant areas, primarily focusing on assessing and analysing potential risks associated with the 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 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 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.
- Whether the supplier has implemented any management systems or controls to assess their suppliers regularly to ensure there is no form of modern slavery present in their supply chain.

- Whether supplier has a Conflict Minerals Policy or other policy on Responsible Minerals Sourcing if applicable to industry they are in.
- Does supplier have a whistleblowing policy and/or process for reporting modern slavery or human rights concerns.

Approximately 95% of our critical and major suppliers who account for 86% of our third party supplier spend 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.
- 95% 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. We will work with remaining suppliers to improve our supply chain risk management and control.
- As part of our continuous improvement focus, we continue to work with our small and minor suppliers to assist them, endorsing the Modern Slavery Act and further risk management initiatives to reduce our supply chain's exposure to modern slavery risk.
- Suppliers procuring products that contain minerals that could potentially be derived through irresponsible minerals sourcing, expressed they have a Conflict Minerals Policy or other policy on Responsible Minerals Sourcing.



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 100 suppliers disclosed that either they have operations or tier 2 suppliers in medium risk countries. Almost 90% of these suppliers have due diligence process and controls in place in assessing the presence of modern slavery in their supply chain, thus lowering our 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.

We encourage 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](#).





## 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 will utilise our ServiceNow based risk register tool to record, track and report risks. Risk Management workshops will be 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.

We continue to undertake supplier audits which include key labour practices and continue to review how we can effectively use these audits to mitigate any risk identified. We continually review 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:

- Review compliance 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.

# Update on our 3-Year Plan

## **Between 1 April 2022 and 31 March 2023 (FY2022), we:**

- Continued to work with suppliers to address modern slavery risk by conducting ongoing assessments and raising awareness through education.
- Imbedded the Modern Slavery Assessment in our Annual Supplier Risk Assessment Questionnaire.
- Expanded our scope of the supply chain assurance program to include a previously 'un-assessed' supplier base.
- Reviewed and updated our standard contract templates to include anti Modern Slavery clause.
- Included new business division's' suppliers in this years' supplier risk assessment.
- Audited suppliers who indicated they potentially source raw conflict minerals to find they are from low-risk countries.

## **Between 1 April 2023 and 31 March 2024 (FY2023), 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.
- Introduce Fujitsu Ethical Sourcing Program by incorporating responsible sourcing standards/guidelines into our Procurement Policy.
- Mandate Human Rights / Modern Slavery risk assessment as part of the selection criteria in the end-to-end Procurement cycle.
- Create a ServiceNow based Modern Slavery Risk Register and conduct regular reviews for remediations and how we are progressing.
- Develop a dashboard to increase the transparency of human rights risks across our supply chain.
- Spot audit 30 suppliers to ensure compliance i.e., requesting specific documentation, policies etc.
- Conduct collaboration sessions with suppliers with offshore operations or subcontracting using migrant labour.
- Conduct a Tier 2 supply chain analysis for selected suppliers to ensure compliance with the Act and assess any modern slavery risks.
- Input into the broader Fujitsu Oceania Environmental, Social and Governance Working Group.

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

- Collaborate with Fujitsu entities globally to adopt Fujitsu best practice. Expand the Modern Slavery Risk management framework to cover the broader Asia Pacific region.
- Broaden stakeholder engagement across our controlled entities, other organisations, and civil society, collaborating with our major customers to promote Fujitsu best practice.
- Encourage Fujitsu suppliers to mandate modern slavery requirements in suppliers' 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.
- Explore market leading tools and platforms to automate the risk management process for Modern Slavery. Improve our online tools by enhancing both the usability and the information available.

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