Compliance

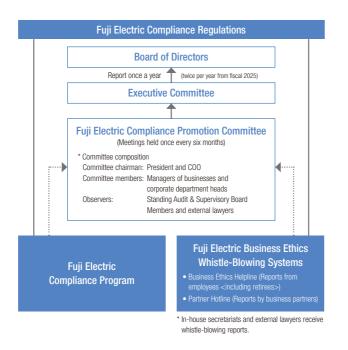
Basic Policies

The Fuji Electric Code of Conduct states that Fuji Electric must "make global compliance a top priority." In addition, we have defined the Fuji Electric Compliance Regulations, a guideline for compliance, under the supervision of the Board

of Directors. We also globally promote compliance through the Fuji Electric Compliance Program and the Fuji Electric Business Ethics Whistle-Blowing Systems.

Promotion System

The Fuji Electric Compliance Promotion Committee is headed by our President and COO as its Chairman, and it consists of control chiefs (managers of businesses and corporate department heads) responsible for regulating laws and acts, with Standing Audit & Supervisory Board Members and outside experts (attorneys) as observers. The Committee meets twice per year to deliberate on the implementation status of the Fuii Electric Compliance Program and the Fuii Electric Business Ethics Whistle-Blowing Systems as well as the plan for implementing the Fuji Electric Compliance Program and then reports to the Board of Directors once per year (twice per year from fiscal 2025). In the event of a compliance infraction, there is a system in place to take any necessary measures such as fact-finding investigations, corrective actions, recurrence prevention measures, internal punishments, and internal and external disclosure



Status of Promotion

Fuji Electric Compliance Program

Fuji Electric has established the Fuji Electric Compliance Program to cover four aspects (rules, monitoring, auditing, and education) related to compliance with Japanese and overseas laws by both the Company and its Group companies in Japan and overseas. Through reviews and revisions made by the Fuji Electric Compliance Promotion Committee, we conduct activities while also actively acquiring external certifications and disclosing information externally in order to verify the effectiveness of our activities from an external perspective.

Fuji Electric Compliance Program



Compliance education

We promote wide-ranging and systematic compliance education and awareness through level-specific and job-specific group training, online training, e-learning programs and web-delivered training, as well as by displaying posters internally and distributing pamphlets.

In fiscal 2024, to strengthen awareness of anti-bribery measures at our overseas bases, we provided education to our overseas sales companies on compliance with foreign competition laws, anti-bribery measures, and trade secret protection.

Fiscal 2024 Compliance Education Results (examples)

Training category	Participants		Details
Level-specific	Newly appointed Directors and Audit & Supervisory Board Members, etc. of affiliated companies in Japan and overseas	36	Obligation to build Fuji Electric Compliance Program
	Newly appointed managers	89	Compliance with major laws
	New employees	276	Introduction of our Fuji Electric Compliance Program and Business Ethics Whistle- Blowing Systems
Job-specific	For sales companies outside Japan	1,265	Compliance with foreign competition laws, anti-bribery measures, and trade secret protection

Fuji Electric Business Ethics Whistle-Blowing Systems

For the purpose of preventing and detecting violations at an early stage, Fuji Electric has introduced and is operating the Fuji Electric Business Ethics Whistle-Blowing Systems, whereby relevant persons inside and outside the Company can report violations of laws and regulations or internal rules in the course of business operations, or facts of that may lead to such violations, to the President and COO of Fuji Electric via whistle-blowing contact points (in-house contact points and external lawyers). (Anonymous reporting is also possible.)

In fiscal 2024, there were 25 reports in Japan and overseas, 3 of which involved violations (2 cases of harassment and 1 accounting issue). In all cases, necessary measures (e.g., corrective actions and recurrence prevention) were taken.

Regarding our response to the reports, we work meticulously to protect whistle-blowers by keeping their personal information confidential and prohibiting disadvantageous treatment and retaliatory or discriminatory acts on the grounds of whistle-blowing. In addition, we take all necessary steps to resolve issues raised by whistle-blowers, including fact-finding investigations, corrective actions,

recurrence prevention measures, and disciplinary actions. We also provide the details of our response to the whistle-blowers themselves as feedback. (We also strive to indirectly provide feedback through the above measures in the case of anonymous whistle-blowing.)

O Business Ethics Helpline

The Business Ethics Helpline handles reports from our executives and employees in Japan and overseas (including retirees and dispatch employees). It is thoroughly promoted among employees through publications in the Company magazine and the intranet.

O Partner Hotline

The Partner Hotline handles reports from external stakeholders. It is thoroughly promoted among them through posts on the website and briefing sessions for business partners.



Partner Hotline https://www.fujielectric.com/about/ procurement/partnerhotline.html



Participation in the "Engagement and Remedy Platform" operated by the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER)

Starting in fiscal 2025, we will participate in the "Engagement and Remedy Platform" operated by JaCER to accept reports on human rights issues and other issues from all stakeholders. JaCER's platform for grievance redress is compliant with the "UN Guiding Principles on Business and Human Rights." By accepting grievances through a third-party contact point,

we aim to ensure fairness and transparency in our grievance handling process.



JaCER https://jacer-bhr.org/en/index.html



Results of Promotion

As a result of implementation of the Fuji Electric Compliance Program and the Business Ethics Whistle-Blowing Systems,

Bribery prevention

With the article "Make global compliance a top priority" stated in the Fuji Electric Code of Conduct, we have declared our commitment to bribery and corruption prevention, and we have disclosed the Fuji Electric Anti-Bribery Policy as part of the Fuji Electric Code of Conduct. This policy declares that we endeavor to prevent bribery throughout the supply chain, such as by ensuring that no Fuji Electric employee (including dispatch employees) ever engages in bribery or any act that could arouse the suspicion of bribery.

We have also established the Fuji Electric Anti-Bribery Guidelines as a set of rules for Fuji Electric employees (including dispatch employees) to help them prevent bribery during their daily business, and we endeavor to prevent bribery through the execution of the Fuji Electric Compliance Program. Fuji Electric will subject all employees involved in bribery to strict disciplinary actions based on our work rules.

In fiscal 2024, there were no incidents of executives or employees being subject to disciplinary actions due to the violation of our anti-bribery rules, and no fines, surcharges, or settlements related to bribery were incurred.

in fiscal 2024 there were no compliance infractions with the potential to seriously impact the management of Fuji Electric.

Prevention of competition law infractions

In an effort to prevent the violation of competition laws, we have established and appropriately revise daily business rules, including our Antimonopoly Act Compliance Manual and Foreign Competition Law Compliance Manual. We also perform daily monitoring by confirming quotations and estimates via a comprehensive bidding information management system and extensive record-keeping. In addition, our internal auditing divisions perform audits in accordance with auditing guidelines, and we conduct extensive level-specific and job-specific training. Any employee who is involved in the violation of competition laws will be subject to strict disciplinary actions based on our work rules.

In fiscal 2024, there were no incidents of executives or employees being subject to disciplinary actions due to the violation of the competition laws, and no fines, surcharges, or settlements related to competition laws were incurred.



Fuji Electric Anti-Bribery Policy https://www.fujielectric.com/company/box/doc/Anti-Bribery%20Policy.pdf



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