

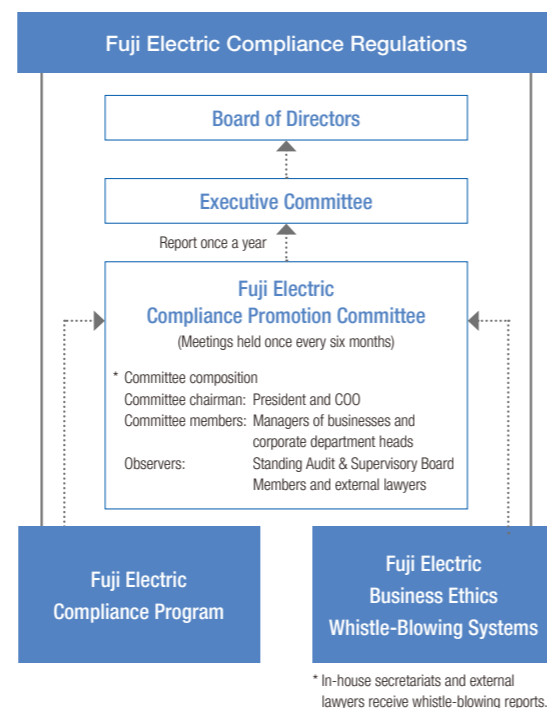
Compliance

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 Fuji Electric Compliance Program and the Fuji 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. 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.



Fuji Electric Business Ethics Whistle-Blowing Systems

To promote self-purification actions by preventing infractions of laws and regulations and ensuring early detection, we have introduced and are operating the Fuji Electric Business Ethics Whistle-Blowing Systems. Under these systems, internal and external parties can report real or suspected violations of laws, regulations, or internal rules in business execution—including matters related to bribery and corruption—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 2022, there were 46 reports from Japan and abroad (17 cases of harassment, 16 cases related to labor, 3 cases related to accounting, and 10 other cases), and 10 of these were infractions (2 cases of harassment, 3 cases related to labor, 1 case related to accounting, and 4 other cases).

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.)

In addition, due to the enforcement of the revised Whistleblower Protection Act on June 1, 2022, we significantly strengthened our protection of whistle-blowers by expanding the coverage of the protection to encompass all Fuji Electric executives and employees, including retirees.

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.

Partner Hotline

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

Partner Hotline
<https://www.fujielectric.com/company/procurement/partnerhotline.html>

Status of Promotion

Fuji Electric Compliance Program

Fuji Electric has established the Fuji Electric Compliance Program to cover four aspects 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

A total of 54 categories of Japanese and foreign target laws (Examples below)

- Anti-corruption and competition laws
- Labor and human rights
- Product safety and the environment
- Taxation and accounting
- Information security
- Export management

- Establishment, revision, abolition, and dissemination of internal rules
- Daily monitoring of the status of compliance with laws and internal rules
- Auditing by third parties
- Compliance education

Compliance education

We promote wide-ranging and systematic compliance education 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.

Fiscal 2022 Compliance Education Results (examples)

Training category	Participants	Details
Level-specific	Newly appointed executives (Japan)	14 Building a legal compliance system
	Newly appointed managers	108 Compliance with major laws
	New employees	258 Overview of our Fuji Electric Compliance Program and Business Ethics Whistle-Blowing Systems
	Overseas base executives	142 Building a legal compliance system
Job-specific	Sales and administrative division employees	2,488 Compliance with major laws
	Overseas sales company employees	616 Bribery prevention and competition laws

Results of Promotion

As a result of implementation of the Fuji Electric Compliance Program and the Business Ethics Whistle-Blowing Systems, in fiscal 2022 there were no compliance infractions with the potential to seriously impact the management of Fuji Electric.

Bribery prevention

With the article “Make global compliance a top priority” stated in the Fuji Electric our Corporate 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. Under this policy, 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 and by requesting that all of our stakeholders—including suppliers and other business partners—strive to prevent 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. Any employee who is involved in bribery will be

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

subject to strict disciplinary actions based on our work rules.

In fiscal 2022, there were no incidents of 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.

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 2022, 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.