

**REPORT OF FUJITSU CONSULTING (CANADA) INC. TO THE MINISTER OF PUBLIC SAFETY UNDER  
THE “FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT” FOR  
THE FINANCIAL REPORTING YEAR APRIL 1, 2023 TO MARCH 31, 2024**

## INTRODUCTION

Fujitsu Consulting (Canada) Inc. ("**Fujitsu Consulting**") is pleased to submit and present this Report to the Minister of Public Safety in respect of Fujitsu Consulting's financial reporting year of April 1, 2023 to March 31, 2024, the whole in accordance with Canada's "*Fighting Against Forced Labour And Child Labour In Supply Chains Act*" (the "**Act**").

Fujitsu Consulting is a corporation amalgamated under the laws of Canada in 1995 and originally incorporated by letters patent in 1973 as Ducros, Meilleur, Roy and Associates Ltd. Today, Fujitsu Consulting is indirectly a wholly owned subsidiary of Fujitsu Limited, a public company incorporated under the laws of Japan and headquartered in Tokyo, Japan.

Fujitsu Consulting offers our clients in Canada a wide range of information technology services including application maintenance services, workplace services, systems integration and consulting. Fujitsu Consulting operates only within Canada and do not conduct business internationally.

Fujitsu Consulting does not manufacture and does not control any entity which manufactures any goods in Canada or outside of Canada.

Fujitsu Consulting does act as the importer of record only of certain technology goods and only in accordance with a long-standing supply arrangement with one Canadian customer (as detailed on page 5 below of this Report) but does not otherwise act (and does not control any entity which acts) as importer of record for any other goods into Canada or in respect of any other Canadian customer.

## **IDENTIFYING INFORMATION**

The following is the required Identifying Information for this Report:

- Entity: This Report is for an “entity” under the Act.
- Reporting entity's legal name: Fujitsu Consulting (Canada) Inc.
- Financial reporting year: April 1, 2023 to March 31, 2024
- Identification of a revised report: This is not a revised Report.
- Business number: 897365342RC0001
- Identification of a joint report: This is not a joint Report.
- Identification of reporting obligations in other jurisdictions: Fujitsu Consulting is not subject to reporting obligations under supply chain legislation in other jurisdictions.
- Entity categorization according to the Act:
  - Fujitsu Consulting:
    - Has a place of business in Canada;
    - Does business in Canada;
    - Has assets in Canada;
    - Has at least \$20 million in assets for at least one of our two most recent financial years;
    - Has generated at least \$40 million in revenue for at least one of our two most recent financial years; and
    - Employs an average of at least 250 employees for at least one of our two most recent financial years.
  - Sector/industry: Professional, Scientific and Technical Services; Other Services (being Information Technology Services)
  - Location: Fujitsu Consulting is headquartered in Canada as well as within the Province of Quebec.

## THE REQUIREMENTS OF SECTION 11(1) OF THE ACT

In our reporting financial year for this Report, Fujitsu Consulting has taken the following steps to prevent and reduce the risk that forced labour or child labour is used in the production of goods imported into Canada by Fujitsu Consulting:

- Mapping activities
- Mapping supply chains
- Reviewing and applying due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in our activities and supply chains
- Continuing to require suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
  - This included the use of a global compliance database and related policies and procedures (called “Third Party Due Diligence” or “**3PDD**”) to confirm relevant information provided by our suppliers to register as a Fujitsu Consulting supplier as well as requiring suppliers to complete a “Corporate Social Responsibility Questionnaire” which includes reporting on a supplier’s forced labour and child labour due diligence policies
- Reviewing anti-forced labour and/or -child labour contractual clauses and ensuring they are included in our procurement contracts
  - This included Fujitsu Consulting’s right to conduct compliance audits of each registered supplier
- Reviewing and applying our anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Continuing to make available our grievance mechanisms
  - This included measures to ensure that Fujitsu Consulting was informed of any complaints against Fujitsu Consulting submitted by any persons under Fujitsu Limited’s global alert system called “**Fujitsu Alert**”. This is a third party managed global system available to all employees across the Fujitsu Limited group of companies as well as to all members of the public, who can anonymously submit complaints about any compliance issues involving any of the Fujitsu Limited group of companies
- Reviewing and continuing to require mandatory training and awareness materials on forced labour and/or child labour
  - This included measures to ensure that all Fujitsu Consulting employees participated in Fujitsu Limited’s mandatory annual compliance and human rights training which includes awareness materials on forced labour and child labour

## THE REQUIREMENTS OF SECTION 11(3) OF THE ACT

a. Fujitsu Consulting's structure, activities and supply chains:

Fujitsu Consulting is a Canadian corporation and is indirectly wholly owned by Fujitsu Limited, a Japanese public corporation headquartered in Tokyo, Japan. We have five office locations in Canada: Montreal, Quebec City, Toronto, Ottawa and Edmonton. We have more than 50 years of innovation in the Information Technology sector in Canada and currently have more than 800 employees across Canada. Fujitsu Consulting does not control any entities and does not operate (and has no office locations) outside of Canada.

Fujitsu Consulting does not manufacture or have manufactured any goods within Canada or outside of Canada. Through a long-standing supply arrangement with one Canadian customer, Fujitsu Consulting does act as the importer of record for certain identification-related technology goods (the "**Imported Goods**"). The total value of the Imported Goods in Fujitsu Consulting's reporting financial year was approximately CAD \$315,00.00.

Fujitsu Consulting's supply chain for the Imported Goods is comprised of two suppliers; the great majority of the Imported Goods (by both volume and dollar value) in Fujitsu Consulting's reporting financial year were manufactured by one United States-based supplier from its operations in the US and its subsidiary operations in Mexico and the United Kingdom. The second supplier was located in the People's Republic of China; imports of the Imported Goods from this supplier were valued at less than CAD \$2,000.00 in Fujitsu Consulting's reporting financial year.

b. Fujitsu Consulting's policies and our due diligence processes in relation to forced labour and child labour:

Fujitsu Limited has an extensive governance and compliance framework in place across the entire Fujitsu Limited group of companies. Through this framework, Fujitsu Limited communicates the values and expectations that the Fujitsu Limited group of companies will not tolerate forced labour or child labour.

"The Fujitsu Way" is Fujitsu Limited's published master policy document which embodies the philosophy of Fujitsu, our reason for existence, our corporate values and the principles that govern our business dealings. The Fujitsu Way incorporates the Code of Conduct, which provides rules and guidelines to be followed by everyone in Fujitsu. The Fujitsu Way Code of Conduct is supplemented by additional Fujitsu Limited group policies, including the Global Business Standards which is designed to provide further guidance to all Fujitsu Limited group employees as to how to act to prevent breaches of the law and to maintain our high standards of business conduct.

For more information on policies and initiatives on compliance within the Fujitsu Limited group of companies, please refer to the following: <https://www.fujitsu.com/global/about/csr/compliance/>

Each principle of The Fujitsu Way is supported with regional policies. For example, in North America, we have policies that include Gifts and Hospitality, Antitrust and Competition, Facilitation Payments, Conflicts of Interest, Procurement CSR and Anti-Retaliation. These are reviewed regularly to ensure they are up to date.

Fujitsu Limited also has several global human rights policies as part of its governance and compliance framework for the Fujitsu Limited group of companies. "We respect human rights" is a principle embedded in The Fujitsu Way's Code of Conduct which underpins all our activities.

In December 2014, Fujitsu Limited released the "Fujitsu Group Human Rights Statement" to promote activities that respect human rights in accordance with The Fujitsu Way Code of Conduct. This Statement was revised in

December 2022, with the aim of ensuring that it becomes embedded in the corporate culture of all of the Fujitsu Limited group companies.

Fujitsu Limited has also publicly announced its support for the ten principles of the United Nations Global Compact based on universal principles regarding human rights and rights at work, such as the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

For more information on policies and initiatives on human rights within the Fujitsu Limited group of companies, please refer to the following: <https://www.fujitsu.com/global/about/csr/humanrights/>

Fujitsu Limited is also a member of the Responsible Business Alliance (RBA), which is a global Corporate Social Responsibility (CSR) alliance. As such, Fujitsu Limited has adopted the RBA Code of Conduct in its CSR Procurement Guidelines and promotes the Human Rights Enlightenment Structure among its suppliers and throughout its supply chain.

Within North America, regional procurement policies and procedures have been implemented which reflect the commitments and expectations of Fujitsu Limited for the Fujitsu Limited group of companies in the areas of compliance with laws, respect for human rights and preventing the risk of forced labour and child labour in our activities and supply chains.

For example:

- Companies who seek to register as a Fujitsu Consulting supplier must be approved through 3PDD. This process includes each supplier completing a Supplier CSR Questionnaire in which the supplier confirms (among other matters) they do not use forced labour or child labour;
  - We have published a Procurement CSR Policy and Guidelines which reiterate our commitment to respect human rights, including the statement we do not use forced labour or child labour and that we require the same commitment from our suppliers; and
  - We have formulated terms and conditions for our procurement contracts under which our suppliers confirm their obligation to comply with laws and their commitment to not use forced labour or child labour of any kind, subject to Fujitsu Consulting's contractual right to audit each supplier's compliance and performance.
- c. The parts of Fujitsu Consulting's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

As previously mentioned above, Fujitsu Consulting is the importer of record for only one Canadian customer. The supply chain for these Imported Goods is comprised of two suppliers; the great majority of these Imported Goods (by both volume and dollar value) in Fujitsu Consulting's reporting financial year were manufactured by one United States-based supplier from its operations in the US and its subsidiary operations in Mexico and the United Kingdom. The second supplier was located in the People's Republic of China; imports of these Imported Goods were valued at less than CAD \$2,000.00 in Fujitsu Consulting's reporting financial year. While we will continue to strive to identify emerging risks (including if our activities and related supply chains were to change), we believe that our current policies and due diligence processes are sufficient to assess and manage this limited geographic risk in our supply chain.

- d. Any measures taken to remediate any forced labour or child labour

Not applicable, since we have not identified any forced labour or child labour in our activities and supply chains.

e. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains

Not applicable, since we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

f. The training provided to Fujitsu Consulting employees on forced labour and child labour

Each December, in connection with the United Nation's International Anti-Corruption Day, Fujitsu Limited rolls out its annual global compliance training. This training is a mandatory, online requirement for all Fujitsu Limited group company employees which reinforces The Fujitsu Way Code of Conduct and the Global Business Standards. In so doing, this training reinforces the commitment of the Fujitsu Limited group of companies and their employees (among other social issues) to respect for human rights and the need to prevent the risk of any forced labour or child labour in our activities and supply chains.

g. How Fujitsu Consulting assesses our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains

To assess such effectiveness, Fujitsu Consulting uses our policies and procedures, including the North American regional Procurement CSR Policy and Guidelines, the 3PDD system, the Fujitsu Alert system, the Supplier CSR Questionnaire, as well as the terms and conditions of our procurement contracts which include the supplier's commitment to comply with law and corporate social responsibility obligations (including the prohibition of the use of forced or child labour) as well as Fujitsu Consulting's right to audit the supplier's compliance and performance of these obligations.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Fujitsu Consulting (Canada) Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year of April 1, 2023 to March 31, 2024.

Jeremy Barry

Senior Vice President & Secretary

May 30, 2024



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I have the authority to bind Fujitsu Consulting (Canada) Inc.