

31 July 2020

Ms Karen Toohey
Discrimination Commissioner
ACT Human Rights Commission
GPO Box 158
Canberra, ACT 2601

Confidential and Legally Privileged

Dear Ms Toohey,

Report on Fujitsu's exemption under Section 109 of the Discrimination Act 1991 (ACT)

On 23 October 2017, Fujitsu Australia Limited ABN 19 001 011 427 (Fujitsu) was granted a limited exemption from the operation of sections 10, 13, 20, 23, and 69 of the Discrimination Act 1991 (ACT) (the Act) (Exemption). The details of the Exemption are set out in the notifiable instrument, Discrimination (Fujitsu Australia Limited) Exemption 2017 (No 1) (Notifiable Instrument). The Exemption was granted subject to certain conditions, including that Fujitsu provide a written report to the ACT Human Rights Commission twice annually on 31 July and 28 February over the period of the Exemption.

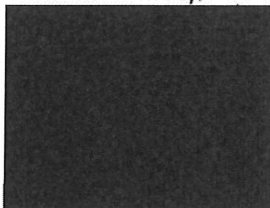
We note that, as a requirement of the Exemption, Fujitsu must report on the following:

- a. the steps taken to comply with the conditions of the Exemption;
- b. the number of persons affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects;
- c. the anti-discrimination training provided by Fujitsu to employees and contractors; and
- d. implementation and compliance generally with the terms of the Exemption order.

Fujitsu's report regarding the above matters is attached.

Please contact [REDACTED]
[REDACTED] if
further information is required.

Yours sincerely,



REPORT 31 July 2020

This Report is for the period from 28 February 2020 to 31 July 2020 (**Reporting Period**) unless otherwise indicated.

1. Steps taken to comply with the conditions of the Exemption

Job advertisements

- 1.1. During the Reporting Period, Fujitsu recruited a total of 46 employees into positions which may have required access to Controlled Technology, and transferred 23 other employees internally into such positions. Where a position was likely to require access to Controlled Technology, Fujitsu provided details within all job advertisements relating to the position, including that the person occupying the position must be able to satisfy ITAR-based requirements which may require specific authorisation for that person to access Controlled Technology.
- 1.2. Fujitsu continues to include wording in job advertisement templates relating to any offer of employment for a position involving (or likely to involve) access to Controlled Technology, to ensure that an appropriate reference is made to the Exemption. A link is included to the contact details of a Fujitsu staff member who is able to provide relevant information to address a candidate's concerns in relation to satisfying ITAR requirements and other security requirements.

Policy compliance with the conditions of Exemption

- 1.3. The purpose of the Exemption is compliance with legal and regulatory obligations imposed pursuant to the Defence Export Control laws of Australia and the United States. As such, Fujitsu has a continual focus on reviewing and amending relevant policies in order to comply with all conditions attaching to the terms of the Exemption. Fujitsu reviews its policies every 12 months to ensure information relating to the terms of the Exemption are accurate and up to date.
- 1.4. Fujitsu also maintains an internal Technology Control Plan (TCP), which provides guidance to all Fujitsu personnel relating to engagements that may involve access to Controlled Technology. The TCP references a copy of the Notifiable Instrument and contains information and personnel responsibilities relating to dual nationals and Controlled Technology.
- 1.5. The TCP defines Controlled Technology, specifies rules and governing access, classification and marking, handling, control of unauthorised persons, recruitment and employment policies, security, education, training, ITAR and Export Control Specialist responsibilities, breach, disclosure, audit and reporting requirements.
- 1.6. An ITAR responsibilities form is made available to personnel who are or are likely to be engaged in work involving responsibilities involving access to Controlled Technology. This is provided during the induction process (and this induction process is adopted even where personnel transfer to roles involving access to Controlled Technology). The ITAR Responsibilities Document references the TCP, is signed by the personnel and is maintained in a register managed by the ITAR and Export Control Specialist.

Employment Contracts

- 1.7. Fujitsu's template employment contract is revised from time to time, where appropriate and/or necessary, and includes appropriate clauses relating to, and referencing the Exemption. Those clauses in the template employment contract clearly set out that Fujitsu may, among other things:
- 1.7.1. Request information from the employee, including about citizenship and substantive contacts, if the employee's duties may require access to Controlled Technology and are affected by ITAR-based requirements; and
 - 1.7.2. Impose restrictions or limitations, including on duties, if the employee's role requires access to Controlled Technology.

Redeployment

- 1.8. Fujitsu is not aware of any harm caused to personnel as a consequence of the Exemption in the sense that no personnel have had to be re-deployed due to ITAR requirements relating to Controlled Technology during the Reporting Period.

Security clearances and passes

- 1.9. Fujitsu employees working on projects or engagements likely to access Controlled Technology are required to have an Australian Security Clearance. The Fujitsu Security team maintains a record of all new and transferred clearances, with access restricted to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.
- 1.10. Fujitsu uses a system of security passes to reflect the fact of access to material subject to Australian security restrictions. The passes are coded but not in such a manner that nationality can obviously be identified from the coding. During the Reporting Period, Fujitsu has not specifically coded security passes to reflect access to Controlled Technology. Fujitsu has continued to comply with the relevant Commonwealth of Australia policies applicable to Defence sites and to Fujitsu security policy with regard to access to Fujitsu premises.
- 2. Who has been affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects**

- 2.1. During the Reporting Period, Hong Kong was added to the list of proscribed countries under section 126.1 of the ITAR by the US Department of State. The update to section 126.1 of the ITAR resulted in one contractor with links to Hong Kong having their access to one Classified ITAR controlled application removed by the Australian Department of Defence. However, there were no adverse impacts on the contractor, because the contractor had only had access to the Controlled Technology application for 48 hours prior to its removal and the contractor did not, and does not, require access to that application to be able to perform their role effectively. As a result, the contractor continues to perform their same role, but without access to that particular Controlled Technology application. There has been no need to redeploy or reject the contractor from any further engagement as a result of the change in access.

- 2.2. No personnel have been rejected for a role or redeployed as a result of the Exemption during the Reporting Period. Further, none of Fujitsu's current employees or contractors who are required to access Controlled Technology are currently in breach of ITAR requirements in the ACT. Therefore, no adverse effects have arisen in the Reporting Period due to the Exemption.

3. Anti-discrimination training of employees and contractors

- 3.1. Fujitsu has a full-time ITAR & Export Control Specialist who manages the company's compliance with export rules and regulations. It is the responsibility of the ITAR & Export Control Specialist to manage compliance with the conditions of the Exemption. The ITAR & Export Control Specialist is responsible for training those personnel who may be conducting the activities covered under the Exemption and acts as an interface between these personnel, including the Human Resources, Recruitment, Legal and Security teams. The ITAR & Export Control Specialist continues to implement training.
- 3.2. During the Reporting Period, Fujitsu has delivered on-line mandatory induction training to employees and contractors that access online training on Fujitsu systems. That training includes, among other things, training about inappropriate workplace behaviour, including discrimination, vilification, harassment, victimisation and other prohibited conduct, under Fujitsu's Working Together Policy and under the applicable laws (including under laws relating to race discrimination). Training remains under continuous review and is conducted annually.
- 3.3. During the Reporting Period, Fujitsu has not conducted face to face anti-discrimination training because of restrictions imposed following the COVID-19 pandemic. However, training courses are available online via Fujitsu's online learning platform.
- 3.4. Information about discrimination and anti-discrimination laws is embedded within the Australian and US Export Controls Induction training package and the Technology Control Plan.

4. Implementation and compliance generally

- 4.1. During the Reporting Period, Fujitsu reviewed its internal Technology Control Plan to ensure accuracy and compliance with any amendments to the Export Control laws of Australia and the United States. Fujitsu has a process of regularly reviewing policies and procedures as appropriate, where ITAR and export technology is used.
- 4.2. Fujitsu conducts a screening questionnaire, which is provided to prospective and current employees applying for a role where Controlled Technology is likely to be involved. The questionnaire asks if the individual has citizenship, substantive contacts or salary in another country. In the Reporting Period 46 questionnaires were completed with no current or prospective employees denied a role due to citizenship, race or substantive contacts in another country.
- 4.3. To the extent any information relating to current or prospective employees or contractors, about their citizenship, nationality, race, and substantive contacts affiliated with

proscribed countries has been obtained and stored, such information is held by the Fujitsu ITAR & Export Control Specialist with restricted access to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.



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ABN 19 001 011 427

28 February 2021

Ms Karen Toohey
Discrimination Commissioner
ACT Human Rights Commission
GPO Box 158
Canberra, ACT 2601

Confidential and Legally Privileged

Dear Ms Toohey,

Report on Fujitsu's exemption under Section 109 of the Discrimination Act 1991 (ACT)

On 13 October 2020, Fujitsu Australia Limited ABN 19 001 011 427 (**Fujitsu**) was granted a limited exemption from the operation of sections 10, 13, 20, 23, and 69 of the Discrimination Act 1991 (ACT) (the Act) (**Exemption**). The details of the Exemption are set out in the notifiable instrument, Discrimination (Fujitsu Australia Limited) Exemption 2020 (No 1) (**Notifiable Instrument**). The Exemption was granted subject to certain conditions, including that Fujitsu provide a written report to the ACT Human Rights Commission twice annually on 31 July and 28 February over the period of the Exemption.

We note that, as a requirement of the Exemption, Fujitsu must report on the following:

- a. the steps taken to comply with the conditions of the Exemption;
- b. the number of persons affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects;
- c. the anti-discrimination training provided by Fujitsu to employees and contractors; and
- d. implementation and compliance generally with the terms of the Exemption order.

Fujitsu's report regarding the above matters is attached.

Please contact [REDACTED]

[REDACTED] if further information is required.

Yours sincerely,



REPORT 28 Feb 2021

This Report is for the period from 31 July 2020 to 28 February 2021 (**Reporting Period**) unless otherwise indicated.

1. Steps taken to comply with the conditions of the Exemption

Job advertisements

- 1.1. During the Reporting Period, Fujitsu recruited a total of 26 employees into positions which may have required access to Controlled Technology, and transferred 17 other employees internally into such positions. Where a position was likely to require access to Controlled Technology, Fujitsu provided details within all job advertisements relating to the position, including that the person occupying the position must be able to satisfy ITAR-based requirements which may require specific authorisation for that person to access Controlled Technology.
- 1.2. A notification about the conditions of the Exemption is available on Fujitsu's intranet (Notice) to all current employees and contractors with access to the intranet. The Notice includes links to a copy of the Exemption and advises Fujitsu personnel who access the system about how they may be adversely affected by the Exemption if they are not Australian citizens or hold dual citizenships. Details are also included in the Notice on how to apply for Australian citizenship.
- 1.3. Fujitsu continues to include wording in job advertisement templates relating to any offer of employment for a position involving (or likely to involve) access to Controlled Technology, to ensure that an appropriate reference is made to the Exemption. A link is included to the contact details of a Fujitsu staff member who is able to provide relevant information to address a candidate's concerns in relation to satisfying ITAR requirements and other security requirements.

Policy compliance with the conditions of Exemption

- 1.4. The purpose of the Exemption is compliance with legal and regulatory obligations imposed pursuant to the Defence Export Control laws of Australia and the United States. As such, Fujitsu has a continual focus on reviewing and amending relevant policies in order to comply with all conditions attaching to the terms of the Exemption. Fujitsu reviews its policies every 12 months to ensure information relating to the terms of the Exemption are accurate and up to date.
- 1.5. Fujitsu also maintains an internal Technology Control Plan (TCP), which provides guidance to all Fujitsu personnel relating to engagements that may involve access to Controlled Technology. The TCP references a copy of the Notifiable Instrument and contains information and personnel responsibilities relating to dual nationals and Controlled Technology.
- 1.6. The TCP defines Controlled Technology, specifies rules and governing access, classification and marking, handling, control of unauthorised persons, recruitment and employment policies, security, education, training, ITAR and Export Control Specialist responsibilities, breach, disclosure, audit and reporting requirements.

- 1.7. An ITAR responsibilities form is made available to personnel who are or are likely to be engaged in work involving responsibilities involving access to Controlled Technology. This is provided during the induction process (and this induction process is adopted even where personnel transfer to roles involving access to Controlled Technology). The ITAR Responsibilities Document references the TCP, is signed by the personnel and is maintained in a register managed by the ITAR and Export Control Specialist.

Employment Contracts

- 1.8. Fujitsu's template employment contract is revised from time to time, where appropriate and/or necessary, and includes appropriate clauses relating to, and referencing the Exemption. Those clauses in the template employment contract clearly set out that Fujitsu may, among other things:
 - 1.8.1. Request information from the employee, including about citizenship and substantive contacts, if the employee's duties may require access to Controlled Technology and are affected by ITAR-based requirements; and
 - 1.8.2. Impose restrictions or limitations, including on duties, if the employee's role requires access to Controlled Technology.

Redeployment

- 1.9. Fujitsu is not aware of any harm caused to personnel as a consequence of the Exemption in the sense that no personnel have had to be re-deployed due to ITAR requirements relating to Controlled Technology during the Reporting Period.

Security clearances and passes

- 1.10. Fujitsu employees working on projects or engagements likely to access Controlled Technology are required to have an Australian Security Clearance. The Fujitsu Security team maintains a record of all new and transferred clearances, with access restricted to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.
 - 1.11. Fujitsu uses a system of security passes to reflect the fact of access to material subject to Australian security restrictions. The passes are coded but not in such a manner that nationality can obviously be identified from the coding. During the Reporting Period, Fujitsu has not specifically coded security passes to reflect access to Controlled Technology. Fujitsu has continued to comply with the relevant Commonwealth of Australia policies applicable to Defence sites and to Fujitsu security policy with regard to access to Fujitsu premises.
2. **Who has been affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects**
 - 2.1. No personnel have been rejected for a role or redeployed as a result of the Exemption during the Reporting Period. Further, none of Fujitsu's current employees or contractors who are required to access Controlled Technology are currently in breach of ITAR requirements in the ACT. Therefore, no adverse effects have arisen in the Reporting Period due to the Exemption.

3. Anti-discrimination training of employees and contractors

- 3.1. Fujitsu has a full-time ITAR & Export Control Specialist who manages the company's compliance with export rules and regulations. It is the responsibility of the ITAR & Export Control Specialist to manage compliance with the conditions of the Exemption. The ITAR & Export Control Specialist is responsible for training those personnel who may be conducting the activities covered under the Exemption and acts as an interface between these personnel, including the Human Resources, Recruitment, Legal and Security teams. The ITAR & Export Control Specialist continues to implement training.
- 3.2. During the Reporting Period, Fujitsu has delivered on-line mandatory induction training to employees and contractors that access online training on Fujitsu systems. That training includes, among other things, training about inappropriate workplace behaviour, including discrimination, vilification, harassment, victimisation and other prohibited conduct, under Fujitsu's Code of Conduct and Working Together Policy and under the applicable laws (including under laws relating to race discrimination). Training remains under continuous review and is conducted annually.
- 3.3. During the Reporting Period, Fujitsu has not conducted face to face anti-discrimination training because of restrictions imposed following the COVID-19 pandemic. However, training courses are available online via Fujitsu's online learning platform.
- 3.4. Information about discrimination and anti-discrimination laws is embedded within the Australian and US Export Controls Induction training package and the Technology Control Plan.

4. Implementation and compliance generally

- 4.1. During the Reporting Period, Fujitsu reviewed its internal Technology Control Plan to ensure accuracy and compliance with any amendments to the Export Control laws of Australia and the United States. Fujitsu has a process of regularly reviewing policies and procedures as appropriate, where ITAR and export technology is used.
- 4.2. Fujitsu conducts a screening questionnaire, which is provided to prospective and current employees applying for a role where Controlled Technology is likely to be involved. The questionnaire asks if the individual has citizenship, substantive contacts or salary in another country. In the Reporting Period 26 questionnaires were completed with no current or prospective employees denied a role due to citizenship, race or substantive contacts in another country.
- 4.3. To the extent any information relating to current or prospective employees or contractors, about their citizenship, nationality, race, and substantive contacts affiliated with proscribed countries has been obtained and stored, such information is held by the Fujitsu ITAR & Export Control Specialist with restricted access to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.



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ABN 19 001 011 427

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Dear Ms Toohey,

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We note that, as a requirement of the Exemption, Fujitsu must report on the following:

- a. the steps taken to comply with the conditions of the Exemption;
- b. the number of persons affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects;
- c. the anti-discrimination training provided by Fujitsu to employees and contractors; and
- d. implementation and compliance generally with the terms of the Exemption order.

Fujitsu's report regarding the above matters is attached.

Please contact [REDACTED] if further information is required.

Yours sincerely,



About Fujitsu

Fujitsu Australia and New Zealand are full service providers of information technology and communication solutions. As one of the largest ICT organisations in the Australian and New Zealand marketplace, Fujitsu partners with our customers to consult, design, build, operate and support business solutions. From strategic consulting to application and infrastructure solutions and services, Fujitsu Australia and New Zealand have earned a reputation as suppliers of choice for leading corporate and government organisations. Fujitsu Australia Limited and Fujitsu New Zealand Limited are wholly owned subsidiaries of Fujitsu Limited (TSE:6702).

REPORT 31 July 2021

This Report is for the period from 28 February 2021 to 31 July 2021 (**Reporting Period**) unless otherwise indicated.

1. Steps taken to comply with the conditions of the Exemption

Job advertisements

- 1.1. During the Reporting Period, Fujitsu recruited a total of 65 employees into positions which may have required access to Controlled Technology. Where a position was likely to require access to Controlled Technology, Fujitsu provided details within all job advertisements relating to the position, including that the person occupying the position must be able to satisfy ITAR-based requirements which may require specific authorisation for that person to access Controlled Technology.
- 1.2. A notification about the conditions of the Exemption is available on Fujitsu's intranet (Notice) to all current employees and contractors with access to the intranet. The Notice includes links to a copy of the Exemption and advises Fujitsu personnel who access the system about how they may be adversely affected by the Exemption if they are not Australian citizens or hold dual citizenships. Details are also included in the Notice on how to apply for Australian citizenship.
- 1.3. Fujitsu continues to include wording in job advertisement templates relating to any offer of employment for a position involving (or likely to involve) access to Controlled Technology, to ensure that an appropriate reference is made to the Exemption. A link is included to the contact details of a Fujitsu staff member who is able to provide relevant information to address a candidate's concerns in relation to satisfying ITAR requirements and other security requirements.

Policy compliance with the conditions of Exemption

- 1.4. The purpose of the Exemption is compliance with legal and regulatory obligations imposed pursuant to the Defence Export Control laws of Australia and the United States. As such, Fujitsu has a continual focus on reviewing and amending relevant policies in order to comply with all conditions attaching to the terms of the Exemption. Fujitsu reviews its policies every 12 months to ensure information relating to the terms of the Exemption are accurate and up to date.
- 1.5. Fujitsu also maintains an internal Technology Control Plan (TCP), which provides guidance to all Fujitsu personnel relating to engagements that may involve access to Controlled Technology. The TCP references a copy of the Notifiable Instrument and contains information and personnel responsibilities relating to dual nationals and Controlled Technology.
- 1.6. The TCP defines Controlled Technology, specifies rules and governing access, classification and marking, handling, control of unauthorised persons, recruitment and employment policies, security, education, training, ITAR and Export Control Specialist responsibilities, breach, disclosure, audit and reporting requirements.

- 1.7. An ITAR responsibilities form is made available to personnel who are or are likely to be engaged in work involving responsibilities involving access to Controlled Technology. This is provided during the induction process (and this induction process is adopted even where personnel transfer to roles involving access to Controlled Technology). The ITAR Responsibilities Document references the TCP, is signed by the personnel and is maintained in a register managed by the ITAR and Export Control Specialist.

Employment Contracts

- 1.8. Fujitsu's template employment contract is revised from time to time, where appropriate and/or necessary, and includes appropriate clauses relating to, and referencing the Exemption. Those clauses in the template employment contract clearly set out that Fujitsu may, among other things:
- 1.8.1. Request information from the employee, including about citizenship and substantive contacts, if the employee's duties may require access to Controlled Technology and are affected by ITAR-based requirements; and
 - 1.8.2. Impose restrictions or limitations, including on duties, if the employee's role requires access to Controlled Technology.

Redeployment

- 1.9. During the reporting period the Department of State amended the Proscribed Countries relevant to this exemption. Fujitsu is not aware of any harm caused to personnel as a consequence of the amendment or Exemption in the sense that no personnel have had to be re-deployed due to ITAR requirements relating to Controlled Technology during the Reporting Period.

Security clearances and passes

- 1.10. Fujitsu employees working on projects or engagements likely to access Controlled Technology are required to have an Australian Security Clearance. The Fujitsu Security team maintains a record of all new and transferred clearances, with access restricted to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.
- 1.11. Fujitsu uses a system of security passes to reflect the fact of access to material subject to Australian security restrictions. The passes are coded but not in such a manner that nationality can obviously be identified from the coding. During the Reporting Period, Fujitsu has not specifically coded security passes to reflect access to Controlled Technology. Fujitsu has continued to comply with the relevant Commonwealth of Australia policies applicable to Defence sites and to Fujitsu security policy with regard to access to Fujitsu premises.
- 2. Who has been affected by the Exemption, the nature of the effects, and the steps taken to address any adverse effects**
- 2.1. No personnel have been rejected for a role or redeployed as a result of the Exemption during the Reporting Period. Further, none of Fujitsu's current employees or contractors who are required to access Controlled Technology are currently in breach of ITAR requirements in the ACT. Therefore, no adverse effects have arisen in the Reporting Period due to the Exemption.

3. Anti-discrimination training of employees and contractors

- 3.1. Fujitsu has a full-time ITAR & Export Control Specialist who manages the company's compliance with export rules and regulations. It is the responsibility of the ITAR & Export Control Specialist to manage compliance with the conditions of the Exemption. The ITAR & Export Control Specialist is responsible for training those personnel who may be conducting the activities covered under the Exemption and acts as an interface between these personnel, including the Human Resources, Recruitment, Legal and Security teams. The ITAR & Export Control Specialist continues to implement training.
- 3.2. During the Reporting Period, Fujitsu has delivered on-line mandatory induction training to employees and contractors that access online training on Fujitsu systems. That training includes, among other things, training about inappropriate workplace behaviour, including discrimination, vilification, harassment, victimisation and other prohibited conduct, under Fujitsu's Code of Conduct and Working Together Policy and under the applicable laws (including under laws relating to race discrimination). Training remains under continuous review and is conducted annually.
- 3.3. Information about discrimination and anti-discrimination laws is embedded within the Australian and US Export Controls Induction training package and the Technology Control Plan.

4. Implementation and compliance generally

- 4.1. During the Reporting Period, Fujitsu reviewed its internal Technology Control Plan to ensure accuracy and compliance with any amendments to the Export Control laws of Australia and the United States. Fujitsu has a process of regularly reviewing policies and procedures as appropriate, where ITAR and export technology is used.
- 4.2. Fujitsu conducts a screening questionnaire, which is provided to prospective and current employees applying for a role where Controlled Technology is likely to be involved. The questionnaire asks if the individual has citizenship, substantive contacts or salary in another country. In the Reporting Period 65 questionnaires were completed with no current or prospective employees denied a role due to citizenship, race or substantive contacts in another country.
- 4.3. To the extent any information relating to current or prospective employees or contractors, about their citizenship, nationality, race, and substantive contacts affiliated with proscribed countries has been obtained and stored, such information is held by the Fujitsu ITAR & Export Control Specialist with restricted access to the Legal, Recruitment, Security, Senior Management and Export teams on a 'need to know' basis.