Compliance

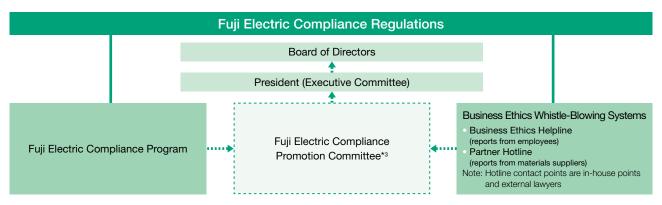
We employ thorough measures to ensure compliance with laws and corporate ethics and always act with a high degree of social conscience to achieve sustained corporate growth.

Basic Compliance Policy

The Fuji Electric Code of Conduct*1 states that we shall "respect, value and conform with all applicable laws and regulations," and has been incorporated into our basic policy. Based upon this policy, we have established and have been implementing the Fuji Electric Compliance Regulations, which is a concrete guideline for compliance, and the Fuji Electric

Compliance Program, which brings together four aspects*2 of domestic and overseas compliance.

- *1 Please refer to Fuji Electric's corporate website for more information.
- *2 (1) Establishment, revision, abolition and dissemination of internal rules;
 - (2) Constant monitoring of status of compliance with laws and internal rules;
 - (3) Auditing of status of compliance with laws and internal rules; and
 - (4) Compliance education regarding laws and internal rules



^{*3} Meets twice each fiscal year to deliberate on compliance execution and planning with the goal of achieving full compliance with laws and social norms globally. Composed of a representative director, compliance representatives, organization heads, the general manager of the Legal Office, Standing Auditors, and an external lawyer

Compliance Promotion Structure

The Fuji Electric Compliance Promotion Committee, which is headed by a representative director and composed of the managers responsible for regulating laws and/or acts, with an outside expert (attorney) as an observer, has jurisdiction over compliance of Fuji Electric.

Global Promotion of the Fuji Electric Compliance Program

Fuji Electric is enhancing the compliance of its overseas operations. At all overseas sites, in addition to globally common items that apply such as the prohibition of human rights violations and unfair dealings, including bribery and corruption, the Fuji Electric Compliance Program reflects the laws and regulations of each region where we conduct business. We practice compliance through the actions of all our subsidiaries in Japan and overseas on the basis of this program.

Operation of Whistle-Blowing Systems in Japan and Overseas ·····

To prevent infractions of laws, regulations, and internal rules and ensure early detection, Fuji Electric has introduced the Business Ethics Helpline System. Under this system, employees in Japan and overseas can report violations or suspected violations of laws, regulations, or internal rules to Fuji Electric's president via the department responsible for compliance or through an external lawyer.

We also operate a Partner Hotline System, which handles notifications from our suppliers about Fuji Electric's materials procurement operations. Building more highly reliable trading relationships with our suppliers is part of fulfilling our social responsibility.

Conducting Compliance Training

Fuji Electric has created a compliance training program for officers and employees of the Company and its subsidiaries that addresses matters they comply with and/or encounter in the course of their business activities. This compliance training has two main thrusts: level-specific and job-specific courses.

Level-Specific Training

Level-specific training is tailored to newly appointed executives of consolidated subsidiaries in Japan, newly appointed managers, and new employees. Level-Specific Training

Training lasts a half to one full day, with sessions focusing on the Fuji Electric compliance framework and the Fuji Electric Compliance Program.

| Newly appointed executives | 22 |
|----------------------------|-----|
| Newly appointed managers | 137 |
| New employees | 215 |
| | |

Attended (Fiscal 2017)

Job-Specific Training ··

Divisions responsible for legal affairs conduct job-specific training that features items for consideration in practical business situations. In fiscal 2017, classroom-based training was conducted mainly for the sales and administrative unit personnel of domestic and overseas companies covering a variety of themes, including antimonopoly laws and the prevention of

corruption. Furthermore, we conducted e-learning programs for employees at all bases, including those overseas.

