

Corporate Ethics/Compliance

Themes of activities in fiscal 2008

In fiscal 2008, NEC Fielding selected more rigorous penetration and promotion of corporate ethics and compliance among all units and individual employees as an agenda for activities in the Group as a whole.

Results of activities in fiscal 2008

In addition to the ordinary Internet education for employees, actual fiscal 2008 activities included seminars in corporate ethics led by outside instructors for the purpose of enhancing awareness in this area in the management layer.

We also continued to send out information by means such as the e-mail magazine toward the goal of encouraging employees to be on the lookout for problem areas throughout the Company.

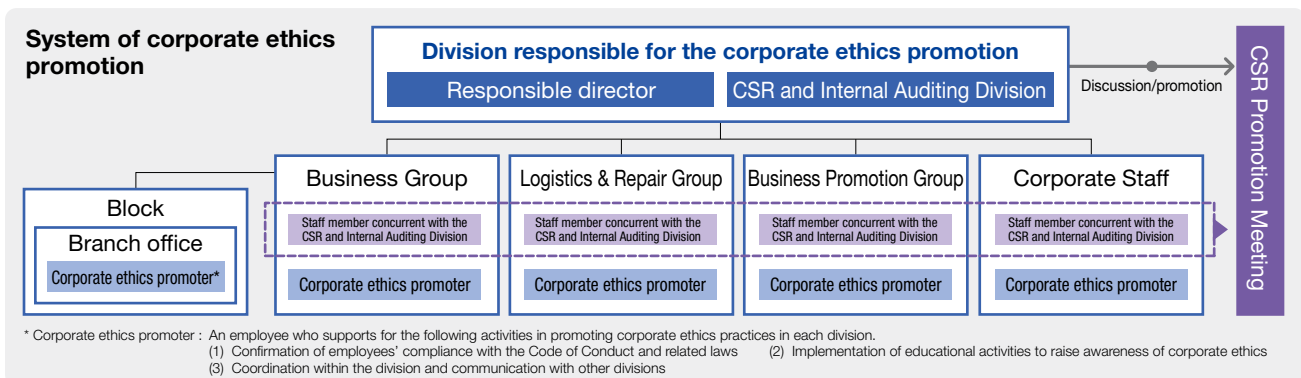
Future challenges

As agenda for fiscal 2009, we intend to strengthen the sharing of information related to corporate ethics and compliance in the Group as a whole. Another task of particular importance is conscious-raising activities for management people so they can effectively lead compliance measures in their own units.

Corporate ethics promotion system

We appoint corporate ethics promoters for all divisions down to the branch offices nationwide. Each promoter cooperates with a staff member concurrent with the CSR and Internal Auditing Division, to assist the

implementation of schemes and measures set out by the CSR and Internal Auditing Division at all levels of the Company.



Educational activities to raise awareness of corporate ethics

Executive seminars by outside instructors

In fiscal 2008, we invited outside experts to speak at executive conferences attended by all division directors as part of our executive employee education related to corporate ethics. We intend to continue heightening awareness of corporate ethics in the management layer by various methods.

Distribution of Fielding Pocketbook

We provide a Fielding Pocketbook to all our employees. This prescribes activity guidelines and basic policies such as the NEC Fielding Charter of Corporate Behavior and the NEC Fielding Group Code of Conduct.

Employee training through the Internet

As a part of our measures for company-wide diffusion of awareness of corporate ethics and compliance, we implemented a program of on-line education on the NEC Fielding Group Code of Conduct for all employees from August to October 2008. All of the Group employees completed the program.

Email magazine and case sheet

We issue and disseminate to all directors and employees the Corporate Behavior Email Magazine which provides various topics, examples of other companies, laws and ordinances, etc. relating to corporate ethics and compliance, as well as the Corporate Conduct Case Sheet which explains our internal rules based on examples, in order to share information within the Group.