



Your Code of Conduct

FUJIKURA AUTOMOTIVE EUROPE GROUP

Fujikura Automotive Europe Group

Mission, Vision and Core Values

Mission

- The Fujikura Group's mission is to create exceptional value for our customers around the world using "Tsunagu" (the Japanese word meaning "connecting") technologies.
- We dedicate ourselves to providing exceptional products and solutions earning our customers' trust and contributing to society.

Vision

- Fujikura's vision is to be the most trusted partner in our markets, to continuously develop innovative and relevant products and solutions, and to positively impact our communities.
- We strive to become the leading player in our markets by utilizing our "Tsunagu" technologies, tirelessly developing innovative and useful products and solutions.
- Each individual within the company will endeavor to become an essential player, thus developing a team that can truly help Fujikura make its mark on the world stage.

Core Value

- **Customer Satisfaction**

"Are you doing enough to ensure customers are perfectly satisfied?"

- **Change**

"Are you willing to take up challenges to drive progress?"

- **Collaboration**

"As a Fujikura associate, are you driven to work together with others to deliver the best possible result for our company?"

TSUNAGU is a Japanese word which means to link, connect, join, tie up. Fujikura started as an electric cable maker, cables which carry electricity connecting a power station to a substation and then to a home.

Fujikura's next products were tele-communication cables, cables which carry voice, data, connecting homes.

Our product is wire harness, cables which connect all parts of a car.

Everything is connected, linked, joined, tied up.

Our products will be used for connection or linkage which carry electricity, light, information, voice, etc. All our products are used for TSUNAGU, and made of TSUNAGU technologies.

A message to the reader

Dear business partner,

I am pleased to present you the Code of Conduct. Of all the existing rules when organizing our activities, this is the one that truly connects us all. It is a basic and vital rule to ensure a proper environment and to generate a healthy relationship between Fujikura Automotive Europe Group and you.

Even if you are an employee or a supplier, a public institution or a customer, here you will find guidelines for an appropriate collaboration.

I call for the cooperation of all of you. Firstly, by complying with this Code and with any law or regulation affecting your company or country, and secondly, in case you witness or suspect that someone violates this Code, I urge you to report it through our whistle blowing channel, by writing to fujikura.automotive.europe@cuatrecasas.com.

Within the Fujikura members, we all have to act in an exemplary way, but I want to highlight the special role of managers and above. You should not only be a reference of behavior towards your teams, but you also should monitor daily activities to either prevent or detect as soon as possible any breach of this Code.

I encourage you to read it carefully and in case you have any doubt, please write to our Conduct Committee via this email address: compliance@eu.fujikura.com.

Thank you in advance for your collaboration.

Sincerely

A handwritten signature in black ink, appearing to be 'Santiago Rodríguez', with a long horizontal stroke extending to the left.

Santiago Rodríguez
President & CEO

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1. Introduction

Our Expectations and Values

Sustain a Culture of Integrity

This Code of Conduct is a statement of our principles and expectations that guide ethical business conduct at Fujikura Automotive Europe Group (hereinafter FAE Group). FAE Group requires all employees to use their judgment, to be accountable for their actions and to conduct business with integrity.

This Code of Conduct reflects our changing business environment and has been approved by the FAE Group Board of Directors. It applies to everyone who acts on behalf of Fujikura Automotive Europe and its controlled subsidiaries — including employees, executive officers, agents, consultants, contingent workers and interns. In addition to governing conduct among employees, this Code governs conduct between employees and customers, competitors and the numerous business providers (including suppliers, vendors, contractors and agents) who assist FAE Group everyday.

You may violate this Code or any company policy simply because a supervisor directs you to do so. If you receive such a request, you should advise your supervisor that the request violates the Code. If your supervisor refuses to modify his or her request, you should contact the Conduct Committee immediately.

Similarly, you may never interfere with or obstruct an investigation conducted by the company or any government agency. In addition, you may never disclose or discuss any investigation with unauthorized persons.

Failure to comply with any provision of this Code or company policy is a serious violation, and may result in disciplinary action, up to and including termination, as well as civil or criminal charges. These consequences may apply not only to employees who violate the Code, but also to those who condone misconduct, fail to report or take reasonable measures to prevent, detect and address misconduct, or seek to retaliate against those who in good faith report potential misconduct.

Set the Tone at the Top

Build Trust and Credibility

We earn credibility with our customers, business providers and co-workers by keeping our commitments, acting with honesty and integrity, and pursuing our company goals solely through honourable conduct.

If you are a supervisor, you have the added responsibility of creating an open and supportive environment where employees feel comfortable asking questions and raising concerns. Ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example.

Your Code of Conduct:

- Read the Code
- Understand the Code
- Utilize available resources
- Comply with the Code

Supervisor: create an open and supportive environment

A Code for all FAE Group employees

2. Scope of Application

- Organizational: The Code applies to Fujikura Automotive Europe and all its controlled subsidiaries wherever they were located.
- Personnel: Directors, employees, consultants, temporary staff and parttimers, irrespective of position, as well as all other relevant parties, are subject to the guidelines set forth in the Code (hereinafter, directors, officers and employees).
- Business partners: Agents, intermediaries, contractors, and suppliers are also required to comply with the Code.
- Conduct: The Code applies to all conduct related to Fujikura business activities. Any conduct that is in violation of laws and regulations, including outside work hours, shall be dealt with accordingly.

3. General Guidelines

Always do what has to be done

Never do what should not be done

Be vigilant in our conduct; comply with all Company and societal rules, and act in a socially responsible manner.

- We shall act in accordance with all laws and societal rules.
- We shall strive to act in good faith based on a sense of common decency.
- We shall always be fair, just and open in all our business conduct.

These strict guidelines can be restated in a simpler form:

- Always do what has to be done.
- Never do what should not be done.

Every FAE Group employee shall be a respectable member of society in order to be a good corporate citizen, accomplished by acting in accordance with these two points.

4. Conduct and Responsible Practices Commitment

FAE Group directors, officers, employees, agents, intermediaries, contractors, clients, and suppliers shall conduct in accordance with the following Guidelines for Conduct:

4.1. General Rules

General Guidelines

- We shall be vigilant in our conduct, comply with all Company and societal rules and act in a socially responsible manner.
- In accordance with common sense, actions based on the principle of self responsibility should form the foundation for all conduct.
- Be sure to conform to socially acceptable manners and etiquette.

Do not break set rules and regulations

Take care not to infringe the rights of others

Compliance with Laws and Violation of Rights of Others

Always stop to think whether your conduct, either at work or in private, is in accordance with the following:

- We shall not break set rules and regulations.
- We shall take care not to infringe the rights of others.

Sincere Conduct

- We shall work seriously and positively, and in a responsible manner.
- We shall never lie or be dishonest in your work, either inside or outside the Company.
- We shall never abuse the position or responsibility given to us, either inside or outside the Company.
- We shall be honest and accurate with records and reports.

Compliance with these Guidelines

- We shall conduct in compliance with the Code, which is based on laws, ethics and Company rules.
- We shall not conduct simply for the purpose of raising profits; it means a breach of the Code and it is unacceptable.
- We shall not force upon any subordinate or colleague against Code provisions.
- Excuses for conduct that breaks the Code, such as “but other employees (or other companies) do it,” are unacceptable.

Socially Responsible Manner

We shall act sincerely and with a socially responsible manner in situations not covered by laws, rules or the Code.

Examples of Violations

- Illegal acts: falsification of private documents, intimidation, theft, fraud, misappropriation, breach of trust, etc.
- Violating social rules: offending public morality, disloyal or insincere behaviour, abuse of rights, etc.
- Breaching Company rules, regulations and standards: breaking work regulations, allotting unfair blame, infringing on work standards.

4.2. Corporate Property

a) Protection of Corporate Assets

General Guidelines

- We shall handle and endeavour to ensure the general upkeep of all other Company property.
- Articles of the Company are viewed as shared property retained from shareholders. Any improper use or consumption of Company property that results in a loss to shareholders or Company shall be considered a breach of the Code.
- We shall never lose or steal Company property.

Use Outside of Work Purposes

- We shall not use Company property outside of work purposes unless authorized by a superior.
- We shall not take or dispose of inventory, equipment or promotional materials without permission.
- Upon resignation, we shall return articles loaned from the Company.

Illicit Use

- We shall not use Company funds and assets for illicit purposes, such as offering gratuities or making payoffs to shareholders.

Correct Notification

- We shall correctly file, maintain and manage records and reports of materials, equipment and inventory.
- We shall make honest and accurate Company reports and expenditure calculations.

Take care of Company properties

Company properties: only for work and licit purposes

Examples of Violations

- Use outside of work purposes: use of telephone and computer for private reasons, unauthorized possession of office materials, personal use of machines/equipment, etc.
- Illicit use: payoffs to shareholders, gratuities, investment in initiatives regarded as non-recoverable, etc.
- Inaccurate reports: dishonest request for funds, disposal of recoverable items, concealment of improper events, overstating hours worked, etc.
- There may be times these actions fall under one of the following categories: theft, fraud, misappropriation, breach of trust or falsification of private documents.

b) Information Management

Guidelines for Conduct

- We shall swiftly and accurately make reports to top management, in accordance with the FAE Group Risk Management Policy, when risks, which have a significant impact on management, arise, take appropriate action and work to minimize damage.
- We shall quickly report all negative information, including operational errors and claims, to the appropriate authority, thereupon seeking direction.
- We shall not release business information to external sources with inappropriate intentions. We shall be careful not to accidentally leak any information.
- We shall take care to protect and appropriately handle personal information.
- We shall be fully aware that falsifying reports to the authorities may result in criminal charges.

Information must be carefully managed

Recording Information

- We shall accurately record work information, communicating such information in a timely manner.
- We shall be fully aware that inappropriate calculation of business results and falsifying reports may lead to erroneous management decisions and have seriously harmful effects.
- We shall not falsely rewrite existing information or dispose of it without permission.

We shall report accurate and on time information

Reporting Information

- We shall report any negative information, such as loss, to our superior as quickly as possible, thereupon seeking direction. We shall be fully aware that concealment and neglect will only aggravate the situation.
- We shall not provide or release false information concerning the Company to external sources.
- With regard to enquiries related to unreleased Company information, we shall not provide any data without confirmation from either your manager or department head.

Inappropriate disclosure can mean a breach of the Code

Protection of Information

- We shall maintain technical information regarding R&D concepts and results, production processes and technological reforms among others as property of the Company by obtained the appropriate patent rights.
- We shall be careful not to leak any technical information before the patent has been applied for.
- We shall handle technical information not protected by a patent with special care.

In particular, the following items must be kept confidential until officially released and must not be used outside of Company operations.

- New product information/R&D information.
- Business and sales plans/forecasts/strategies/policies and financial data.
- Information related to personnel or individual privacy, such as transfers and organizational reforms.
- We shall not copy, disclose or distribute such important or technical information without the permission of our superior.

Preservation and Retention of Documents

We shall not destroy, discard, alter or delete potentially relevant documents and electronically stored information. These potentially relevant records include any documents, emails or other data reflecting the following:

- Contacts or meetings with people at other companies that manufacture and sell wire harnesses, as well as the reason or content of those contacts or meetings.
- Pricing, bids or responses to requests for quotations with regard to wire harnesses.
- Demand for wire harnesses and sales of wire harnesses.
- Production of wire harnesses and production constraints.
- Customers and how the Company won, retained or lost customers.
- Anything with respect to any alleged agreement between competitors of the Company and the Company with regard to wire harnesses.
- Any other business documents regarding wire harnesses.

Preserve and retent documents

Acquired Information in Relation to Employment

- Upon resignation, we shall return all important and technical information as well as official materials to the Company.
- After resignation, we shall not disclose or use important or technical information learned at the Company unless authorized by the Company.
- While employed at the Company, in the case of making a personal application for a patent, we shall first consult with and seek direction.
- We shall not release academic and technical papers unless authorized by a superior.

Examples of Violations

- Intentionally altering sales or profit figures through inappropriate calculation.
- Concealing or reporting erroneous information concerning serious misconduct.
- Making reports to public offices without proper authorization.
- Taking documents, recordable media such as floppy disks or trial products off Company premises without permission.
- Making external announcements and applying personally for patents before an official application has been made.
- Inadequate management and careless use of information, including the following:
 - Discussing Company matters in public places such as trains and restaurants, still with family or colleagues.
 - Recklessly imparting confidential information at Company reunions and so on.
 - Placing documents in places that can be easily viewed by others, such as desktops.
 - Leaving documents in such disarray that they may be mislaid.
 - Executing inappropriate disposal methods and not erasing or shredding confidential materials.
 - Sending e-mails or packages to the wrong address.

Company information must be accurate and properly managed

Insider trading is forbidden

4.3. Insider Trading

General Guidelines

- We shall be fully aware that any securities trading while possessing our “material non-public information” (insider trading) are prohibited by the Securities Exchange Law.
- We shall be fully aware that any other company’s securities trading even to client companies, while possessing its “material non-public information” learned at the workplace, shall be regarded as insider trading.
- If we acquire any important information from customers, we shall not communicate to others except when necessary for business affairs.

Examples of Violations

- Buying or selling Fujikura stock for personal gain while possessing material non-public information about the Company.
- Buying or selling Fujikura stock for personal gain while possessing material non-public information about affiliated companies.
- Buying or selling securities, such as stock issued by the aforementioned client, for work-related or personal gain while possessing its material non-public information about clients companies.

Supplementary Items Regarding Insider Trading

- Whether or not profit was made by trading stocks is irrelevant. Trading securities while possessing its material non-public information is a criminal act.
- Personnel in a position to know the facts must not infer awareness despite ignorance.
- Declaring that the use of material non-public information was unintentional, despite having plans to trade securities, will not be accepted.

4.4. Customer Relations

a) Provision of Safe Products

General Guidelines

- With regard to product safety, you are required to conduct planning and design from the user's perspective. You must be confident that the products provided to society have been sincerely manufactured with a confirmed level of safety.
- Products that do not comply with set specifications and standards must not be offered.
- You must not offer misleading explanations or false assurance concerning product safety.
- Upon receiving a claim regarding a product, you are required to swiftly and sincerely deal with the matter, being sure to inform your superior or other concerned party without delay.

Examples of Violations

- Making false or misleading explanations or presentations regarding product safety, quality or terms and conditions.
- Not giving proper attention to customer claims made by any channel.

b) Protection of Customer Information

General Guidelines

- We shall keep customer information learned at work confidential.
- We shall be fully aware that information supplied by a customer shall remain their inherent property and supplying such information to a third party constitutes a breach of privacy.

Examples of Violations

- Divulging information to a third party regarding new products being developed by a customer, upon receiving a query concerning components comprising said product.
- Carelessly broadcasting information overheard at a customer's site.

We must produce and sale safe products

Customer information learned at work is confidential

We must not infringe the free and fair competition

4.5. Preservation of a Sound Competitive Base

General Guidelines

- We shall strive to better the competition in terms of quality, price and delivery of products and services provided to customers.
- We shall endeavour to conduct fair, open and free competition while supplying superior products and services.
- We shall be fully aware that consulting with competitors about price and product volume infringes on the code of fair trade.
- We shall not block free and fair competition by exploiting products with high market share goes against socially acceptable norms.
- We shall not provide entertainment or gifts to customers in excess of accepted business and social norms.

Examples of Violations

- Consulting with customers about price and product volume, thereafter exploiting product and service weaknesses by unfairly promoting one's own strengths and increasing price.
- Making inappropriate demands to suppliers that do not concern the quality, price or delivery of products supplied.
- Offering gifts in excess of accepted business and social norms and providing morally unacceptable entertainment.
- Forcing an improper price on subcontractors in excess of accepted business and social norms.

Respect other's intellectual property, copyright and trademarks

4.6. Respecting the Rights of Others

General Guidelines

- When required to use the intellectual property of a third party, we shall not infringe the intellectual property rights of said third party.
- We shall manage and handle confidential information acquired from another company, that is used internally under agreement, appropriately pursuant to said agreement.
- We shall obtain approval to copy software or use images, text and data released on the Internet.
- We shall employ technology that is being used under license from another company after total comprehension of the contract details.

Examples of Violations

- Using the intellectual property (copyright, trademark, patent, etc.) of a third party that is protected by law without proper authorization, whether intentional or unintentional.
- Using a copy of a third party's copyrighted work for business purposes without permission.
- Using a third party's registered service mark, trademark or mark that strongly resembles the above for the Company's products without authorization.

4.7. Relations with Suppliers

General Guidelines

- Before selecting suppliers, we shall make a fair and just evaluation of essential terms and conditions regarding quality, delivery and price to choose the best alternative for the Company.
- We shall not select suppliers or determine terms and conditions after accepting entertainment or gifts, nor make decisions based on personal reasons, such as employing relatives, as it may affect Company profit and is a breach of trust.
- We shall not abuse the Company's dominant position to make inappropriate purchases or force unrelated terms and conditions on suppliers.
- As a general rule, we shall not accept entertainment or gifts from suppliers.
- We shall not provide socially unacceptable entertainment or gifts to suppliers.
- We shall refrain from receiving rebates or kickbacks included in trade terms and conditions.

Examples of Violations

- Exploiting your position or role in the Company to accept personal conveniences or economic benefits from suppliers.
- Accepting gifts in excess of accepted business and social norms even at seasonal gift-giving time.
- Abusing positions of superiority to force the provision of entertainment, such as invitations for sportive events.
- Concluding a contract with a company based on friendship despite the relative high price.

Suppliers' election based on objective evaluation of different alternatives

4.8. Relations with Public Officials and Government Officials

a) Entertainment/Gift-Giving Concerning Public Officials

General Guidelines

- We shall be fully aware that presenting money or entertainment to public officials or those recognized as public officials by law to take advantage of their position equates to bribery and will be treated as such.
- We shall be fully aware that offering money to public official to further business affairs, such as gratuities over and beyond accepted levels, shall be viewed as bribery.
- As a general rule, we shall not offer entertainment or gifts to public officials or quasi-public officials.
- We shall not demand socially unacceptable conveniences for individual work purposes from public officials or quasi-public officials.
- We will provide information that does not violate confidentiality obligations and make requests that do not involve bribery in any way.

Examples of Violations

- Offering invitations for sportive events to public officials or quasi-public officials, even if they are old friends, for the purpose of discussing work matters.
- Presenting money as a summer or year-end gifts in excess of accepted business and social norms to public officials or quasi-public officials.
- Beware that the act of offering money or entertainment is bribery in itself.

b) Payoffs to Government Officials

General Guidelines

- We shall not inappropriately or unlawfully provide economic benefits such as donations to government officers.

Examples of Violations

- Offering money to candidates during election campaigns.
- Making donations to individuals or associations except for those recognized by laws.
- Making petitions while dining or joining in any leisure activity with government officials.

Our relations with public officials must be free of any suspicion

4.9. Shareholder Relations

General Guidelines

- We shall treat the Company's shareholders fairly and with respect.
- We shall strive to disclose appropriate management information to shareholders in a timely fashion.
- We shall not offer profits to specific shareholders to influence voting rights.
- We shall take a resolute stand against any organization, group or individual threatening the order and safety of public society that claims to be shareholders and try to force payoffs.
- We shall swiftly and positively disclose relevant information to shareholders.

Examples of Violations (as a Fujikura subsidiary which contributes to the consolidated information)

- Falsifying asset securities reports.
- Not reporting infractions of terms set forth in the Information Disclosure Regulations.
- Offering benefits to specific shareholders, (such as organizations which threaten the order and safety of public society) in relation to the voting rights of shareholders.

4.10. Environmental Protection

General Guidelines

- We shall strive to further environmental preservation by practicing resource-conserving activities, such as energy saving and recycling, in keeping with the environmental charter and spirit of ISO 14001.
- We shall endeavour to contribute to the protection of the environment through operational activities, including the development and marketing of eco-products.
- We shall comply with national and local standards, as well as Company regulations, of pollutants, including wastewater discharged during operations.
- We shall legally and appropriately dispose of Industrial waste generated during operations in line with laws and Company regulations.
- We shall positively reinvest the benefits obtained from environmental protection activities in corporate operations.

Examples of Violations

- Discharging factory wastewater without purification.
- Not reporting corrections made to drafts given to governing authorities.
- Having unauthorized agencies dispose of industrial waste.
- Bothering local people with machine noise, vibration or foul odours.
- Feigning ignorance despite discharging harmful substances off-site.

Strictly comply environmental protection laws and Company regulations

You must respect the community you live in

4.11. Harmony with the Local Community

General Guidelines

- As a member of society you should have self-awareness, you should have pride as an employee of the company, you should constantly conduct oneself with gratitude towards the local community and you should engage in activities that will not cause embarrassment.
- You must always respect the area you are operating in.
- You must continually strive to give what you can back to the community.
- You must never cause problems for the local people.

4.12. Overseas Activities

Respect the culture of each country

General Guidelines

- You shall conduct activities overseas in full consideration of the country's culture and customs.
- You shall pay close attention to the details of contracts with overseas partner companies and credit surveys.
- You shall verify whether there is a possibility that infringements on overseas local laws will develop into major international issues.
- You shall have self-awareness as an employee of the Company and shall behaviour in a manner that takes safety into consideration at all times.
- You shall strive to gain sufficient knowledge of the country or region's religion, culture and customs before making overseas business trips or being posted overseas.
- You must not boast about your nationality in less fortunate or developing countries.
- You shall pay particular attention to historical and religious taboos.

Examples of Violations

- You must pay attention to religious customs. As one example, you should not send Christmas cards to people in Islamic countries.
- Eating foods forbidden by religion in public places.
- Speaking ill of the country's culture.
- Not fulfilling your role as a member of the community by solely pursuing profits.

4.13. Opposing Anti-Social Organizations

General Guidelines

- We shall take a resolute stand against any organization, group or individual threatening the order and safety of public society.
- We shall not surrender to or collude with any organization, group or individual threatening the order and safety of public society.
- We shall report all acts of coercion, intimidation and violence, irrespective of name or position, immediately to the police.

Do not collaborate with those who threaten the order and safety of public society

Examples of Violations

- Agreeing to illegal or unfair demands concerning donations, monetary support or subscription fees to information-related magazines, irrespective of name or position.
- Interacting with or paying any organized crime syndicate for assistance in solving a problem at work.

4.14. Workplace Environment

a) General Work Environment

General Guidelines

- Superiors in particular shall communicate daily with their subordinates and create a breathable workplace. Subordinates shall cooperate with superiors and create a cheerful workplace.
- You shall avoid taking a self-centred attitude and unilaterally pushing yourself on your subordinates according to your own circumstances.
- You shall avoid behaviour and language, which undermines the respect of subordinates as individuals.
- You shall unconditionally avoid behaviour and language, which abuses the hierarchical relationship in the workplace or causes discomfort to the opposite sex.
- Personal information within the workplace shall also be subject to the personal information protection rules.

Communication and cooperation at workplace

Examples of Violations

Inappropriate discrimination:

- Any form of discrimination or harassment based on one's race, skin colour, religion, gender, age, nationality or physical disability (e.g., sexual harassment; breach of Labour regulations).

b) Occupational Health and Safety

General Guidelines

Take care not to cause injury or be injured by always conducting safe operations in line with regulations.

5S:

- *Seiri = order*
- *Seiton = tidiness*
- *Seison = sanitation*
- *Seiketsu = hygiene*
- *Shitsuke = discipline*

- We shall strive to avoid accidents in the workplace by promoting '5S' (Seiri = order, Seiton = tidiness, Seison = sanitation, Seiketsu = hygiene and Shitsuke = discipline).
- We shall not operate any machinery or equipment without proper qualification.
- We shall always wear protective gear when conducting dangerous operations.

Examples of Violations

- Not giving the directive to wear a helmet or confirm safety when subcontractors are working overhead.
- Forcing unqualified personnel to operate a forklift just because of a lack of human resources.
- Not reporting accidents to pad the safety record.
- Assuming safety is unrelated to business departments, therefore neglecting the safety of workers.

4.15. Conflicts of Interest

General Guidelines

- We shall strive to avoid conflicts of interest with the Company.

A conflict of interest means any circumstance where a Vice President, member of the Board of Directors, or any other senior management personnel or their related parties have an actual, potential or perceived opportunity to prefer their own interests, or those of any other person or organisation, to the interests of Fujikura. Having a conflict of interests, it is not corruption itself, but corruption could arise from these situations.

For these purposes, related parties will be:

- That person's close relatives, including children and spouse or domestic partner, children of that person's spouse or domestic partner; siblings and dependants of that person or that person's spouse or domestic partner.
- Entities owned by the mentioned persons or controlled, direct or indirectly, by them.
- Entities owned by the mentioned persons' close relatives or controlled, direct or indirectly, by them.

Therefore, all the persons included in the definition of conflict of interest will complete and sign a "Conflict of interests' statement" every fiscal year and full details of any matter that may give rise to a Conflict of Interest will be immediately provided to the Conduct Committee of the Company, to enable the Conflict of Interest to be properly recorded and managed. Likewise, any person will abstain from any decision where such a Conflict of Interest arises, such as participation in Sourcing Committees, issuing of Purchase Orders, quotations, approval of suppliers, etc.

Examples of Violations

Conflicts of interests with the Company:

- Make business, directly or indirectly, that entail current or potential effective competition with the company or that imply a permanent conflict of interest with the company.
- Completing transactions with the company, except when these are ordinary transactions are made following Fujikura internal regulations.
- Using or invoking their position to unduly influence the completion of private transactions.
- Making use of company assets, including confidential information of the company, for private purposes.
- Obtaining advantages or remuneration from third parties separate from the company or its group, regarding the fulfillment of its role, unless it refers to simple expressions of courtesy.
- Intervening in deals with the purpose of collecting a mediation fee when the business partner is the company of an acquaintance.
- Demanding a rebate or some form of entertainment from a business partner.
- Accepting gifts in excess of accepted business and social norms.
- Releasing Company information or supplying materials to a close friend who works in a rival company.
- Opening a business or working at another company while employed by the Company without prior permission from the Company.

Avoid conflict of interest with the Company

5. Whistle Blowing System

5.1. Speak Up

Do the Right Thing Because it's the Right Thing to Do

Report about questionable or unethical behaviour

At FAE Group, everyone should feel comfortable to speak his or her mind, particularly with respect to ethical concerns. You must report suspected and actual violations of this Code and Compliance Program. FAE Group will investigate reported instances of questionable or unethical behaviour.

In deciding whether a violation of the Code has occurred or is about to occur, you should first ask yourself:

- Would I feel uncomfortable describing this conduct at a staff meeting? To my family? To the media?
- Will this conduct hurt Fujikura in the long run? Will it cause Fujikura to lose credibility with its customers, business providers or investors?
- Will this conduct hurt other people such as other employees, investors or customers?
- Will this conduct subject me, my co-workers or the company to legal fines or criminal charges?

If the answer to any of these questions is “yes” or even “maybe,” you have identified a potential issue that you must report.

The whistle blowing report is received by an external and independent Law Firm that has the responsibility to receive the communications, analyze them, and keep the confidentiality on your identity.

The outsourcing of the Whistle blowing channel allows you to freely report any illegal or dishonest activities.

Confidentiality of the reporter is guaranteed by an external Law Firm.

5.2. Principles

Confidentiality of the reporter is guaranteed by an external Law Firm

- All employees must be obliged to report any whistle blowing concerns. Any possible retaliation is never allowed.
- The external Law Firm must guarantee that the complainant's identity will be managed confidentially towards the Company.
- False reports are strictly prohibited. The Company will take disciplinary measures when reports are proved to be false.
- Any individuals involved in an investigation of suspected whistle blowing concern shall keep the content of the investigation strictly confidential to the full extent provided by law. In the course of the investigation, there might be required to contact or identify the complainant as, the non-possibility of this fact, it may lead on the prompt termination of the case. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know.

5.3. Who can be a Whistleblower?

- Employees and directors.
- Business partners.
- Clients.
- Suppliers.

You may submit a confidential complaint or inquiry to the Conduct Committee through the e-mail address fujikura.automotive.europe@cuatrecasas.com or through postal mail to the following address of the external Law Firm:

CONDUCT FUJIKURA AUTOMOTIVE EUROPE
Cuatrecasas, Gonçalves Pereira
Almagro 9
28010 Madrid (Spain)

*fujikura.automotive.europe@
cuatrecasas.com*

*CONDUCT FUJIKURA
AUTOMOTIVE EUROPE
Cuatrecasas, Gonçalves
Pereira
Almagro 9
28010 Madrid (Spain)*

5.4. Cooperate with Investigations

You must cooperate completely in any investigation relating to FAE Group, and must be truthful at all times. You may never interfere with or obstruct an investigation conducted by the company or any government agency. In addition, you may never disclose or discuss an investigation with unauthorized persons.

5.5. Conduct Committee

The Conduct Committee was established by the Board of Directors of Fujikura Automotive Europe SAU on June 2015 with the aim of overseeing and promoting the implementation of the Compliance Program.

If you have any doubts or questions regarding a Code provision, you should contact the Committee at compliance@eu.fujikura.com. You will not be disadvantaged in any way for having consulted or corresponded with regards to the Code.

5.6. Publicity of the Code

The Code of Conduct shall be made available in all major operating languages within FAE Group, and remain posted on www.fujikura-automotive.com/compliance. The Code of Conduct shall be subject to the appropriate disclosure, training and awareness-raising actions to be properly understood and implemented in the Group.

*Code of Conduct available
at FAE Group website*

Fujikura Automotive Europe SAU

June 28th, 2019

History of Revisions

Version 1 (December 19, 2008)

Approved by the Board of Directors.

Version 2 (June 29, 2012)

Previous message to employees substituted by a new one signed by Mr. Kamada.

In the part II-General Rules, point 3-Structure, is substituted the Executive Committee by the CEO for controlling the Corporate Code Committee.

Deletion of the text "At the same time as employees make themselves familiar with adhering to the Fujikura Automotive Group Code of Conduct" in the last paragraph of the Code.

In the part IV-Specific Guidelines, point 2-Corporate Property, (2) a. Guidelines for conduct, it is added the paragraph "Document preservation and retention".

Substitution of "Fujikura Automotive Group" by "FAE Group".

Approved by the Board of Directors.

Version 3 (June 30, 2015)

Previous message to employees substituted by a new letter.

Substitution of "Corporate Code Committee" by "Conduct Committee".

Point 2: Scope of application. Inclusion of a new point with the title "Business partners".

Deletion section II.2 y II.3 in Point 2. Point 2, section II.4 is now located at Point 5.5.

Point 4. Conduct and responsible practices commitment. New paragraph broadening the range of the targets: the directors, offices, employees, agents, intermediaries, contractors, clients, and suppliers.

Speak Up section is renumbered as Point 5 Whistle Blowing System, including new content and sections, such as Point 5.2 Principles, Point 5.3 Who can be a whistleblower?, Point 5.4 Cooperate with Investigations, Point 5.5 Conduct Committee, and Point 5.6. Publicity of the Code.

Inclusion of the former part Enactment of FAE Group Code of Conduct into the Part "Legal notice" which is modified and moved to the end.

Approved by the Board of Directors.

Version 4 (January 8, 2018)

Previous Fujikura Automotive Europe Group Mission, Vision and Core Values substituted by a new one.

Previous message to employees substituted by a new letter.

Point 5.5: Substitution of the email address to contact with the Conduct Committee
"compliance@fujikura-automotive.com"
by "compliance@eu.fujikura.com".

Version 5 (June 28, 2019)

Point 4.15. Conflicts of Interest: Development of the content of this point

In the point 5.2 the sentence "anonymity is not allowed" is deleted, and it is added the sentence "In the course of the investigation, there might be required to contact or identify the complainant as, the non-possibility of this fact, it may lead on the prompt termination of the case".

English and German versions of the Code of Conduct are including a footer in page 1 to point that the term Employee is addressing any genders throughout the document.

Approved by the Board of Directors.

Legal Notice

This Code of Conduct is not a binding contract. Adherence to the standards of the Code of Conduct is a condition of continued relationship with FAE Group. This Code does not give you rights of any kind, and may be changed by the company at any time without notice. Reports and complaints of suspected misconduct are confidential. FAE Group will not tolerate retaliation against whistleblowers that report suspected misconduct, or provide information as part of an investigation.

As is the case with all rules and regulations, the real significance of the FAE Group Code of Conduct lies not in its formulation, but rather its implementation.

In particular, since FAE Group Code of Conduct is based on Fujikura's basic management policy of "mission, vision and core values", it is important for all employees to quickly and accurately commit to memory the regulations herein, and execute them without deliberation.

The Company emphasizes the importance of creating a corporate culture that facilitates honest and open discussion about all matters. These factors are imperative in all areas of operations, including education.

