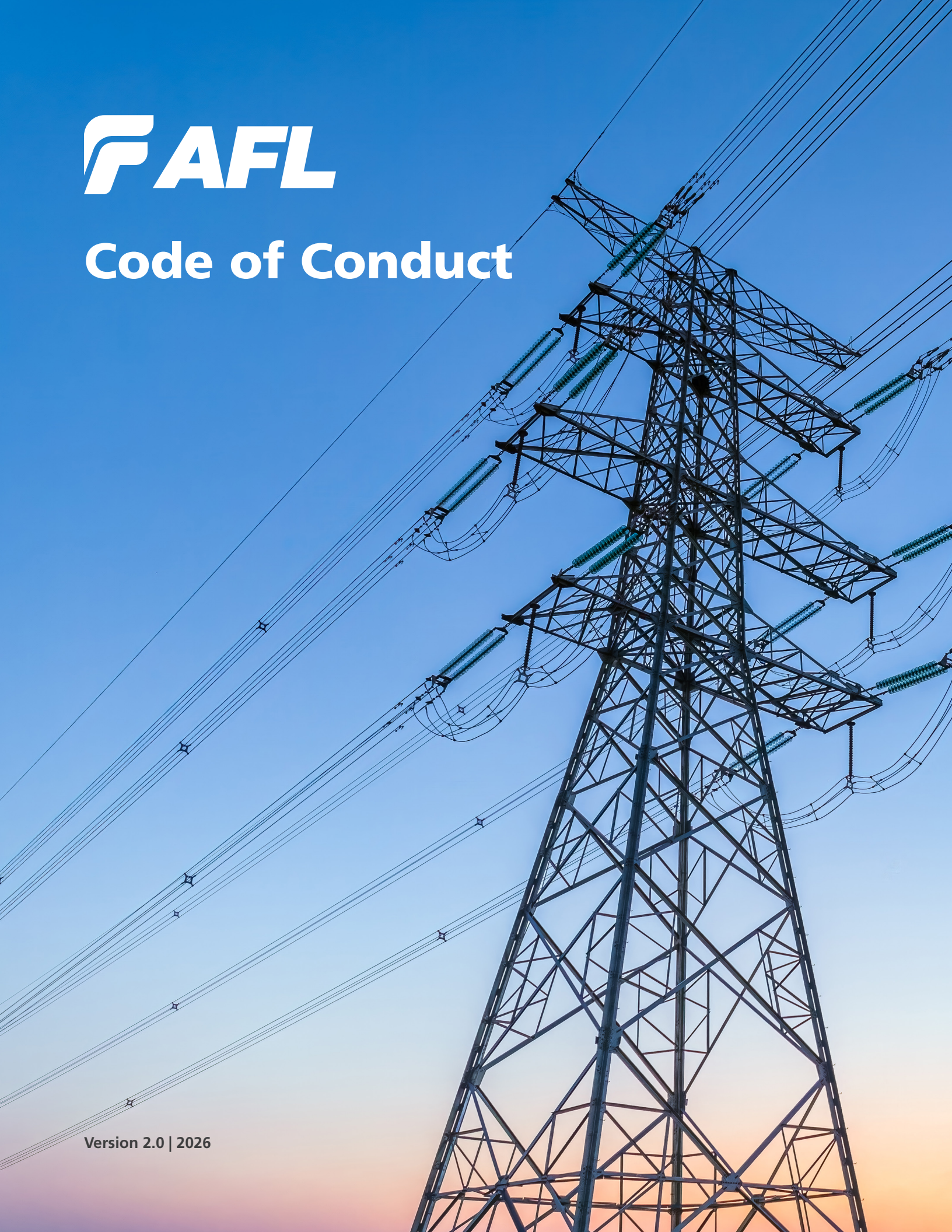
Code of Conduct



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Table of Contents

Introduction 03

Our Code 04

Know The Code

Your Responsibility

Speaking Up and Reporting

Our People 05

Promoting a Respectful Workplace

Maintaining Privacy

Protecting Our Environment, Health and Safety

Our Company 06

Maintaining Accurate Books and Records

Preventing Fraud

Complying with Laws

Protecting Company Assets

Conducting Political Activity Appropriately

Our Business Partners 07

Avoiding Conflicts of Interest

Gifting and Entertaining Appropriately

Competing Fairly

Preventing Bribery and Corruption

Securing Human Rights and Conducting Business Responsibly

Supporting Documents and Reference Materials 09

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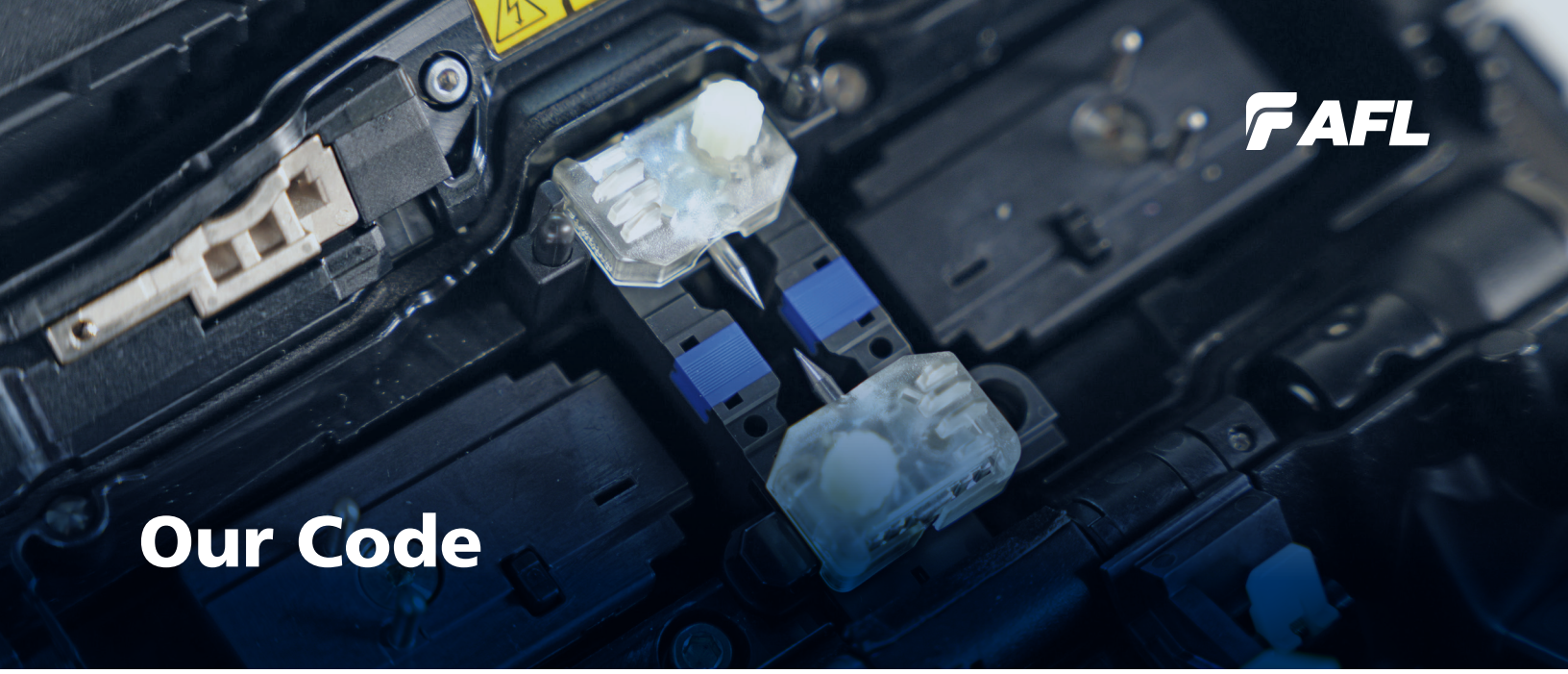
Introduction

At America Fujikura Ltd. ("AFL"), we are committed to conducting business the right way. Our Core Values, Customer Focused and Community Centered, grounded in integrity and accountability, guide our decisions and actions. This Code of Conduct explains the standards we expect all employees to follow and provides guidance for addressing ethical issues that may arise in the workplace. When in doubt, consult this Code, review applicable policies, or ask for guidance. Speaking up and seeking help are important parts of maintaining our culture and values.

This Code applies equally to all employees of AFL and our affiliates. AFL officers and managers have a special responsibility to ensure adherence to the Code in their areas of operation.

You can report any questions or concerns at any time to your manager, Human Resources, the Legal/Compliance departments, or the AFL Integrity Line at aflintegrity.com (Reporting Channels).

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Our Code

Know the Code

When faced with a difficult decision, ask yourself:

- Is it legal?
- Is it consistent with AFL's values and this Code?
- Would I be comfortable if others knew about it?

If you are unsure of what to do in any given situation, reach out to your manager, the Human Resources or Legal/Compliance departments, or the AFL Integrity Line.

Your Responsibility

Everyone is accountable for following the AFL Code of Conduct, and failure to do so could result in disciplinary action, up to and including termination. We also expect everyone working on our behalf, including consultants, agents, suppliers and business partners, to acknowledge this Code of Conduct, comply with our policies, and adhere to ethical standards. We must never ask or permit a third party to engage in any activity that violates these standards.

Speaking Up and Reporting

If you know of, reasonably suspect, or experience unlawful, unethical, or inappropriate conduct, you must promptly report your concern through any of AFL's Reporting Channels, including the AFL Integrity Line at aflintegrity.com, where reports may be made anonymously where permitted by law.

AFL takes all reports of actual or suspected misconduct seriously and will review them promptly. Reports will be handled as confidentially as possible, consistent with the need to conduct a thorough investigation and comply with applicable legal requirements. Employees are expected to be honest, transparent, and fully cooperative in internal investigations.

AFL strictly prohibits retaliation against any person who, in good faith, raises a concern, reports suspected misconduct, participates in an investigation, or otherwise assists in the review of a potential violation. A good-faith report means that the individual reporting reasonably believes the information provided is true, regardless of whether the concern is ultimately substantiated.

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Our People

Promoting a Respectful Workplace

At AFL we treat each other with respect and dignity. This means we maintain an environment that is free of harassment, bullying, and discrimination of any kind. Employees must understand and comply with AFL's workplace conduct policies and should promptly report conduct that violates our standards through a Reporting Channel or other available reporting resource.

Maintaining Privacy

AFL respects and protects the personal information of employees, customers, suppliers and other business partners. We are committed to complying with all applicable laws and policies that cover our collection, use, transfer and storage of personal information. Employees who handle such information must protect it from unauthorized access, use, disclosure, loss or misuse and comply with our policies and all legal requirements.

Protecting Our Environment, Health and Safety

AFL is committed to providing a safe and healthy workplace and conducting business in a responsible manner with respect to the environment. Employees are expected to comply with applicable safety and environmental requirements and promptly report unsafe conditions, incidents, or concerns.

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Our Company

Maintaining Accurate Books and Records

All books and records must be accurate, complete and reliable. This applies to all records, whether financial, operational, quality-related, or other.

Preventing Fraud

AFL does not tolerate fraud or intentionally dishonest conduct. Employees must never falsify records, misrepresent information or intentionally circumvent internal controls. Likewise, employees must never process transactions without a legitimate business purpose, appropriate approval, and adequate supporting documentation.

Pressure to meet a deadline, achieve a business objective, or deliver a desired result is never a justification for altering records, bypassing controls, or skipping required approvals.

Employees must promptly report any actual or suspected fraud, theft, misappropriation, or other dishonest conduct through a Reporting Channel.

Complying with Laws

All employees and anyone acting on AFL's behalf must comply with all laws and regulations which apply to our business, no matter where the business is being conducted.

Protecting Company Assets

AFL assets include funds, property, equipment, vehicles, information systems, work time, confidential information, intellectual property, resources, records, and other company resources. Employees are responsible for protecting these assets from theft, loss, waste, unauthorized use, and misuse. AFL information must be safeguarded and used only for legitimate business purposes through systems, tools, and technologies. This includes the responsible use of artificial intelligence or other emerging technologies in accordance with company policies and applicable requirements. Employees must promptly report any suspected loss, theft, unauthorized disclosure, or misuse of AFL assets or information.

Conducting Political Activity Appropriately

AFL respects the right of employees to participate in civic and political activities. Employees who engage in such activities must do so on their own time, using their own resources, and in their personal capacity. Employees must not imply that AFL supports, endorses, or sponsors their personal political views or activities. AFL funds, facilities, systems, equipment, communications channels, and other resources may not be used for political activities unless expressly authorized and permitted by law.

AFL may engage in lawful political or governmental affairs activities to promote the Company's legitimate business interests. Any such activities must comply with applicable laws and AFL policies.

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Our Business Partners

Avoiding Conflicts Of Interest

AFL employees must always use their judgment to act in our company's best interests. A "conflict of interest" exists when an employee's personal interests, relationships, or activities interfere or appear to interfere with AFL's best interests. Employees must not allow personal relationships with customers, suppliers, competitors, business partners, or other employees to impair objective business judgment. All potential conflicts of interest must be disclosed through one of the Reporting Channels or AFL's conflicts disclosure system. The Compliance Officer has the ultimate authority and responsibility to evaluate and determine the resolution of potential conflicts of interest. Employees must promptly update a prior disclosure if circumstances change or a new conflict arises.

Gifting And Entertaining Appropriately

Whether offered or received, business-related gifts and entertainment must always be:

- Legal and ethical;
- Consistent with customary business practices;
- Reasonable in value;
- Appropriate under the circumstances and unlikely to create the appearance of impropriety; and
- Not cash or a cash equivalent, except as permitted by AFL policy.

Employees must never offer, request, provide, or accept gifts, meals, entertainment, or anything of value that could improperly influence, or appear to improperly influence, a business decision. Raise questions regarding gifts and entertainment through a Reporting Channel.

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Our Business Partners (continued)

Competing Fairly

AFL competes vigorously but fairly for suppliers and customers, and Employees must not:

- Communicate with any competitor relating to price or any term that affects pricing or production levels;
- Divide or allocate markets or customers;
- Agree with a competitor to boycott another business; or
- Put unlawful or improper conditions on purchases or sales.

If you encounter a situation that raises competition law concerns, stop the discussion immediately and seek guidance from the Legal Department.

Preventing Bribery and Corruption

AFL prohibits bribery, kickbacks, and other forms of improper inducement. Employees must never offer, promise, authorize, provide, request, solicit, or accept anything of value to improperly influence a business decision or secure an improper advantage. This prohibition applies in all business dealings, including those involving government officials, suppliers, customers, competitors and other third parties. Employees must comply with all applicable anti-corruption laws and promptly report any actual or suspected violations through a Reporting Channel. AFL may report confirmed illegal activity to the appropriate authorities as required or permitted by law.

Securing Human Rights and Conducting Business Responsibly

AFL conducts business in a manner that respects human rights, dignity, and fair treatment. We do not tolerate forced labor, child labor, human trafficking, or other forms of exploitation within our operations or business relationships. We seek to conduct business with suppliers, contractors, and other business partners who share our commitment to lawful and ethical labor practices and respect for human rights.

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Supporting Documents and Reference Materials

Provided below are links to AFL policies, procedures, and guidelines that support the content of this Code.

AFL's Core Values

Travel & Expense Policy

Conflicts of Interest Policy and Disclosure System

Information Security Policy

Acceptable Use Policy

Generative AI Policy

Privacy Policy

Workplace Violence Policy

Discrimination and Harassment Policy

Environmental, Health and Safety Policy

Slavery and Human Trafficking Statement

Modern Slavery Policy

Supplier Code of Conduct

Legal & Compliance Intranet: aflglobal.sharepoint.com/sites/legal-compliance

You can report any questions or concerns at any time to your manager, Human Resources, the Legal/Compliance departments, or the AFL Integrity Line (Reporting Channels).

AFL Integrity Line: aflintegrity.com

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AFL

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