



Slavery and Human Trafficking Statement

America Fujikura Ltd. and its subsidiaries ("AFL") are committed to treating people with dignity and respect in the workplace and in the communities where we do business, as well as to the respect and protection of human rights. AFL has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective system and controls to ensure modern slavery is not taking place anywhere in the AFL business or in any of its supply chains.

AFL's parent company, Fujikura Ltd., is a supporter of the United Nations Global Compact (UNGC) which consists of ten principles in the areas of human rights, labor, the environment, and anti-corruption. The compact requires its supporters' businesses to adopt sustainable and socially responsible policies and practices and implement them as a good citizen of the world.

AFL is also committed to ensuring there is transparency in our own business and in our approach to identifying modern slavery through our supply chains, consistent with our disclosure obligations under the Modern Slavery Act of 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

Activities in FY2016 related to prevention of modern slavery

AFL's Business and Structure: AFL manufactures, engineers and installs fiber optic products and equipment that helps provide high-speed voice, video and data services to customers in a wide variety of industries providing literally thousands of products and services that are in use in over 120 countries around the world. AFL has operations in the United States, Canada, Europe, Australia and Asia with manufacturing facilities in the United States, United Kingdom, Germany, Mexico, Paraguay, Brazil, China and Australia. (See AFL website, www.aflglobal.com)

Modern Slavery Policy: AFL adopted its Anti-slavery and Human Trafficking Policy in 2016 and continues the process of implementing aspects of the new policy within our global business units and supply chains.

Due Diligence

1. **Supplier Qualifications:** AFL utilizes a decentralized supply chain model. Each business unit qualifies its own vendors and materials suppliers and conducts certification processes. Our manufacturing business units have prequalification processes in place for new suppliers and vendors which form part of their Quality and EHS Management Systems. This may include regular re-qualification and auditing of existing suppliers, based on risk assessment processes. AFL has added supplier self-assessment questionnaires addressing modern slavery to the qualification process in our business units and will continue to implement this system with new and existing suppliers throughout our supply chain during this fiscal year. This certification process will require our supply chain suppliers to certify to the best of their knowledge that the materials they

supply or incorporate into products are generated in compliance with applicable anti-slavery and human trafficking laws.

2. **Verification of Supply Chains:** AFL is committed to fair labor practices within our supply chains. Where allowed, AFL has added or expanded the "Right to Audit" clause in our new and renewal supplier contracts. AFL may periodically audit product supply chains to specifically evaluate and address risks of human trafficking and slavery, with priority given to high-risk locations. Should modern slavery concerns be exposed during audit, AFL is committed to working with suppliers towards improvement, to make a positive difference to the workers, and only terminate suppliers in cases of extreme refusal to improve and comply.

Training: AFL requires all new associates to review and acknowledge the Modern Slavery Policy as part of the associate orientation process. AFL presented the new policy to all existing employees with email access by way of an Ethics & Compliance newsletter article. AFL provided procurement and supply chain associates with training on modern slavery and human trafficking, particularly with respect to identifying and mitigating risks within the supply chain.

Reporting: AFL provides its global employees with an avenue to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain by directly reporting to management, or by anonymous reporting by phone or internet through our Ethics & Compliance Portal. Outside of our business, third parties wishing to raise concerns may contact the AFL legal department by calling (864) 433-0333.

This statement is made pursuant to §54(1) of the Modern Slavery Act 2015 and constitutes AFL's Slavery and Human Trafficking Statement for the fiscal year which ended March 31, 2017.

A handwritten signature in blue ink, appearing to read 'Jody Gallagher', followed by a horizontal line.

Jody Gallagher
President and Chief Executive Officer
AFL
June 2017