



CODE OF CONDUCT

FOR SUPPLIERS AND BUSINESS PARTNERS



1. APPLICATION

This Code of Conduct aims to define the expected behaviour of all suppliers and business partners of the Furukawa Electric LatAm group in different situations, basing their actions on integrity, ethics and morals, including practices related to ESG (Environmental, Social and Corporate Governance) and SDGs (Sustainable Development Goals), respecting the applicable legislation and other requirements described in this document.

Furukawa considers that it is the responsibility of its suppliers and business partners to disseminate and extend the criteria, guidelines and requirements described herein to its employees, executives, partners, members and shareholders, as well as all related parties ensuring the behavior related to the contracts based on ethical and moral principles.

In case of doubts, suggestions and even reports about violations related with Furukawa, one should seek the communication channels established for such, such as the Ethics Channel, whose access link is available on the company's website (www.furukawalatam.com). In Brazil, reports, questions and suggestions can also be made by phone on **0800 600 3250**, or directly to the company's Compliance Department (compliance@furukawalatam.com).

As we are sure that we can count on your full support in complying with these guidelines, and for that, we request that the term of commitment on the last page of this document be duly completed, signed and sent to your contact at the Furukawa Electric LatAm group, as soon as possible.

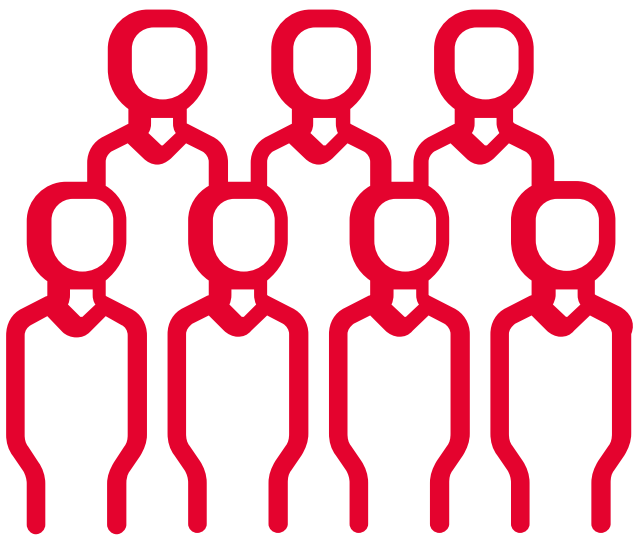
2. COMPLIANCE POLICY

Furukawa always seeks effective results that provide the well-being of shareholders, employees, suppliers, business partners and society, in line with ethical principles and standards, expressed through its Compliance Policy:

“The commitment of Furukawa Electric LatAm is to provide products, services and solutions to attend the market requirements, acting with integrity and transparency in the course of business, complying with the applicable legislation.

To meet this commitment, we recognize as basic elements the following principles:

- To be an example of ethics and contribute to the development of a society based on principles, transparency and integrity;
- To spread the compliance culture from Top Management through decision making based on company's principles and values;
- To require that suppliers and business partners follow ethical standards and comply with related legislation;
- To encourage, through appropriate channels, the report of any attitude that violates any conduct valued by Furukawa;
- To apply continuous improvement to the evolution of processes, practices and internal controls of the compliance management system.”



3. COMMITMENT

Furukawa Electric LatAm, through its senior management, declares its commitment and that of the entire company with ethics, integrity and transparency, not condoning with corruption or with any act contrary to law and order, requiring the same from its suppliers and business partners.

In this sense, Furukawa has actions for the prevention, self-control and risk management of money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction, which are governed by the following provisions:

- a. Zero tolerance for events or situations that aim to use the company for illicit, illegal or contrary to morals and good customs;
- b. Establishment of contractual and/or commercial relationships with an individual or legal entity, whose identity is or can be fully determined, whose funds come from honest and legitimate sources and whose conduct are in accordance with applicable laws.

Furukawa's suppliers and business partners must always seek to do the right thing, effectively strengthening the organizational culture. They must also strictly comply with applicable law, including anti-bribery and anti-corruption laws globally and those that apply to Furukawa's operations in the countries in which they operate.



4. COMPLIANCE WITH LAWS

Ethical and righteous acting is crucial in all operations and business relations. Our suppliers and business partners must act in such manner and comply with applicable laws and contractual rules established between the parties.

Furukawa's suppliers and business partners must:

- Act with absolute integrity in business, strictly respecting and complying with legislation and regulations applicable in the countries where they operate, including environmental and labor legislation.
- Comply with all national and foreign anti-corruption and anti-bribery laws, and anti-money laundering legislation where the supplier and/or business partner does business.
- Not engage, directly or indirectly, in any activity that constitutes infringement under the anti-corruption laws.
- Have no involvement on any illegal practice that aims to benefit Furukawa or own businesses (i.e.: bribery, offer, promise or payment in cash, gifts, conflicts of interest, among others).

5. DISCRIMINATION AND HARASSMENT

As part of ESG management Furukawa expects its suppliers and business partners to contribute to the promotion of a safe, respectful and orderly environment.

Diversity contributes to continuous collaboration, creativity and innovation, so Furukawa does not allow any type of discrimination and prejudice, whether due to race, color, religion, gender, sexual orientation, marital status, social status, age, nationality, political orientation or any type of mental or physical disability.

Moral harassment, sexual harassment, disrespect or any type of abuse of power, are not tolerated.

6. HUMAN RIGHTS

According to Furukawa's philosophy, values and principles, in full harmony with the pillars of the ESG, SDGs and based on the Universal Declaration of Human Rights, all stakeholders must have their human rights respected and protected.

For this reason, Furukawa adopts actions to promote activities that respect human rights, also taking all necessary measures to prevent any action that impacts such rights within the organization, encouraging its suppliers and business partners to do the same.



7. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

These are two of the ESG pillars, Environmental and Social, which are part of Furukawa's history and culture, fully aligned with the SDGs.

Thus, Furukawa demands that its suppliers and business partners to comply with the applicable labor legislation, providing healthy and decent working conditions to their employees, not using child labor or conditions similar to slavery, nor imposing or maintaining its employees in inhuman labor conditions and not condoning human trafficking.

Furukawa's suppliers and business partners must comply with the applicable environmental legislation. Besides, Furukawa recommends that they promote a rational use of natural resources, preserve the environment, recycle and reduce the waste generated in production processes, working for a more sustainable future and prioritizing the SDGs, which are most connected with their business strategy.



8. CONFIDENTIALITY

Furukawa prohibits its suppliers and business partners from disclosing any information from Furukawa and/or its clients, that are obtained due to the relation established between the parties, maintaining confidentiality of information, unless authorized in writing by Furukawa.

Personal data must be handled by suppliers and business partners only when necessary and only for legitimate, clear and predetermined purposes, in compliance with LGPD legislation – General Data Protection Law.

9. INTELLECTUAL PROPERTY

Intellectual property is deemed as all programs, plans, projects, processes, products, products under development, improvements, trademarks, patents, innovations, know-how, industrial designs and software developed at the company as well as financial, business or market information, or any other activity of non-material nature developed at the company or contracted from same.

The intellectual property of Furukawa Electric LatAm and of any other third party must be respected, including copyright, patents and original documents.

The intellectual property of any product or project developed with Furukawa belong to it, unless otherwise established in contract.



10. GIFTS AND PRESENTS

Aiming to avoid any misinterpretations that could negatively affect the relation among the parties, Furukawa understands that any gifts or presents, received or offered by the company, must preferentially be of institutional character (calendars, pens, agendas, etc.).

We highlight that Furukawa employees are instructed to only accept gifts and presents with maximum value equivalent to USD75.00 (seventy-five dollars) in local currency.

Delivery or sending any gift or present must compulsorily and exclusively take place on the premises of one of the units of the Furukawa Electric LatAm group.



11. GENERAL PROVISIONS

This Suppliers and Business Partners Code of Conduct is valid indefinitely, until issuance of a revision.

All suppliers and business partners of Furukawa must comply with this Code of Conduct and may not claim any unawareness of the guidelines set out in same, under any circumstances.

Furukawa believes it is extremely important to have a cordial and respectful relation between the parties in any proceedings involving the companies.

Non-compliance with this Code may imply immediate termination of Agreements between Furukawa and suppliers or business partners, without any prejudice to its rights, whether legal or contractual.



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TERM OF COMMITMENT

I, _____
(name), ID # _____, _____
_____ (position or role), formal representative of _____
_____ (company name), General Taxpayer Registry # _____
_____, established at _____

_____ (address), HEREBY DECLARE that I am aware, understand and covenant our company to comply with the provisions set out in the **Code of Conduct for Suppliers and Business Partners of Furukawa Electric LatAm S.A. group**, set up on May 2022, **a copy of which was to me delivered herein**, which embodies the provisions of the anti-corruption law, and practices related to ESG (Environmental, Social and Corporate Governance) and SDGs (Sustainable Development Goals).

In the same way, I will seek to share the principles of this Code with our employees and supply chain, especially with those who are directly involved in provision of services or supply of goods to Furukawa.

I furthermore hereby declare that upon doubt or awareness of violations to this Code of Conduct and anti-corruption or other applicable legislation, I will promptly report to the Compliance Department at Furukawa, directly or via one of the appropriate channels set out in this Code.

City and date

Signature