



CODE OF CONDUCT



MESSAGE OF THE PRESIDENT

Furukawa holds as a principle to comply with all laws and regulations applicable at the venues in which it operates. In the same manner, endeavors to maintain an environment wherein ethics and respect prevail.

Likewise, pursues an environment where ethics and respect prevail and is fully committed to the Sustainable Development Goals (SDG) and to the premises of an ESG performance in the Environmental, Social and of Corporate Governance, which are part of the Furukawa DNA.

This Code of Conduct was created to guide our employees in all their relationships, both internal and external.

We expect that through its reading everyone can understand and comply with the norms established by the company and, in case of doubts, seek guidance from the Compliance area.

It is our duty to report any violations of this Code through the appropriate channels, so we are able to correct deviations in an adequate manner.

I urge everyone to always act ethically, encouraging our colleagues and partners to do the same.



A handwritten signature in black ink, appearing to read 'Foad Shaikhzadeh'.

Foad Shaikhzadeh
President
Furukawa Electric LatAm

INTRODUCTION

This Code of Conduct defines the attitude expected from all employees from the units of FURUKAWA ELECTRIC LATAM (FEL) group units in several situations, guiding their actions on integrity and moral.

This document does not aim at providing all the answers to the most varied situations that may arise throughout the company's daily activities. Thus, each one must reflect and question the adequacy of their own conducts and of colleagues in relation to values and ethical behavior expected by the company.

Furukawa's Compliance Management System is made up of nine Pillars, which are responsible for its effectiveness. This Code of Conduct is one of these Pillars, as follows:

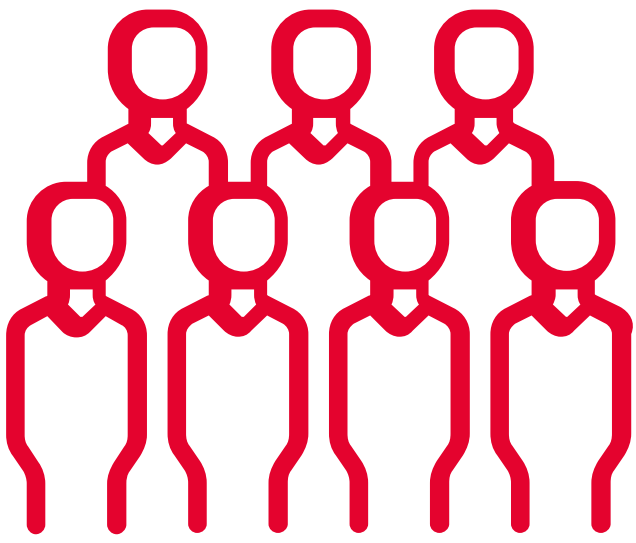
1. Support from Top Management;
2. Risk assessment;
3. Code of conduct;
4. Internal controls;
5. Education, training and communication;
6. Ethic channel;
7. Investigations;
8. Due Diligence;
9. Auditing and Monitoring.

It is the duty of all employees to support this Code of Conduct and engage in the activities, training, processes and controls of the Compliance Management System, in order to keep it constantly effective. Therefore, if invited to contribute, it must do so in an ethical, honest and transparent manner, with emphasis and action on the themes of the Pillars mentioned above and on practices related to ESG (Environmental, Social and Corporate Governance) and SDG (Sustainable Development Goals).

In case of doubts, suggestions and even reports on violations of this Code of Conduct, seek the channels established for this purpose, such as the Ethics Channel, with link available on the Intranet and at the company's website. In Brazil, the report may be carried by calling **0800 600 3250**, or directly to the company's Compliance Department, at compliance@furukawalatam.com.

Violations of this Code may have severe consequences and may lead to adoption of legal and disciplinary actions, including warning, dismissal, and even court proceedings.

APPLICATION



This Code of Conduct, as well as the additional procedure available in the company's documents system, applies to all employees and officers of FEL, its Subsidiaries and Branches. It is also applied to service providers or internal third parties, that is, those who have facilities of their companies at any Furukawa unit.

COMMITMENT

Ethical, honest and transparent performance is the duty of all employees. The Top Management of FURUKAWA ELECTRIC LATAM declares its commitment and that of the entire company to ethics, integrity and transparency, not condoning corruption or any act contrary to law and order.

In this sense, Furukawa has actions to prevent, self-control and manage the risks of money laundering, terrorist financing and financing 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 illegal, 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 who conduct their activities in accordance with applicable laws.

Furukawa employees must always seek to do the right thing, effectively strengthening our organizational culture. They must also regularly assess the risks pertaining to the company's processes and business, including risks related to corrupt practices.



GENERAL GUIDELINES

4.1 INTERNAL RELATION

4.1.1 COMPLIANCE WITH LAWS

There must be full compliance with all laws and other regulations requirements applicable to company activities at all levels of public administration (federal, state, and municipal), as well as of countries where the company carries out business.

Any conduct that violates laws, norms or procedures or, furthermore, implies illegal act of any nature, is not allowed.

4.1.2 DISCRIMINATION AND HARASSMENT

Furukawa employees are responsible for maintaining a work environment where everyone feels welcome and free from discrimination, harassment or other inappropriate conduct. Employees must behave with courtesy and consideration when interacting with each other and with people with whom the company has business relationships.

Diversity contributes to continuous collaboration, creativity and innovation, which is why 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, mental or physical disability, among others.

Furukawa's hiring and promotion processes, as part of ESG management, focused on Social and related to the applicable SDG, offer equal opportunities to all qualified individuals. The company seeks to create a workforce that reflects the diverse population of the communities where it operates. All employees must be treated fairly with regard to their differences.

Moral harassment and sexual harassment are not tolerated at the company. Moral harassment is deemed as any and all abusive conduct, namely manifested through behaviors, words, acts, gestures, jokes, attitudes, and writings, among others, that may cause damage to the personality, dignity, to physical or psychological integrity of a person or group of persons, threatening their job or degrading the work environment mood. It may take place at different hierarchy levels and also among employees of the same level.

Sexual harassment is characterized by the use of authority of the position to obtain or attempt to obtain sexual favors from a subordinate person or at lower hierarchy level, and also through sexual, physical, or verbal intimidation, establishing a hostile, humiliating, and intimidating situation at the work place, practiced by colleagues or any other employee at the company.

Discrimination, disrespect and harassment towards employees, client, supplier, visitor, or any other person at company facilities or upon dealing business at same, regardless of the place, is not allowed.

4.1.3 WORK ENVIRONMENT

The commitment to safety at work is a duty of all company employees. Thus, the practice of safe attitudes must be constant in all activities, as well as adequately reporting any perceived risk or accident incurred to the labor safety area, to the CIPA (Internal Committee for Accident Prevention) or to immediate manager.

Cooperation and teamwork are the great allies of the Furukawa culture and they reinforce the company's purpose of keeping a healthy and harmonious environment in the workplace. To do so, employees are instructed not to participate in the dissemination of information without proof (rumors). In case of doubts about the veracity of any information disseminated in the company, it must be clarified with the management. The company values punctuality in all events and meetings, which shows respect for the other participants.

Furukawa understands that the choice of clothing and accessories is a personal matter, however, it recommends the use of clothing appropriate to the professional environment, especially at external work-related events and activities.



4.1.4 RELATEDNESS AND ROMANTIC RELATIONSHIP

The company allows hiring of employees with a family relationship, as long as they do not carry out functions with direct hierarchical subordination or activities that generate and/or characterize conflicts of interest. These must also be submitted to all stages of the selection process, not admitting privileges in relation to other candidates.

Likewise, romantic relationship between employees are allowed, provided that the same rules of family relationship applies and that private issues do not interfere with professional activities. Discussions or public displays of affection are not tolerated at the company's premises.

4.1.5 USE OF ALCOHOL, DRUGS, BEARING WEAPONS AND VIOLENCE AT THE WORK ENVIRONMENT

Consumption and/or permanence on company facilities or in activities relating to work, under the effect of any type of drug or alcoholic beverage, is strictly forbidden. Consumption of alcoholic beverages on company facilities is restricted to celebrations authorized by the company, always in moderate manner.

Bearing fire arms is exclusively allowed to security professionals, duly empowered. Other employees may not carry any type of weapons, including cold weapon, at company facilities or activities relating to the company.

Physical or verbal violence is unacceptable in any situation, whether on the company premises or in work-related activities.

4.1.6 USE OF COMPANY RESOURCES

Company resources must not be used for other purposes than those set by the company and must be preserved so as to avoid depreciation or misuse.

The use of properties, equipment, business opportunities, and company information systems is not allowed for proper benefit or of third parties, in detriment to Furukawa's interests.

Computer resources (email, systems, etc.) must not be used to disclose documents with contents that are indecent, discriminatory, or defamatory, rumors, and chains.

4.1.7 INTELLECTUAL PROPERTY

Intellectual property is an intangible and strategic asset for the company. Intellectual property means all programs, plans, projects, processes, products, products under development, improvements, brands, patents, innovations, know-how, industrial designs and software developed in the company, as well as financial, commercial or market, or any other non-material activity carried out in the company or by its contractor.

All property rights regarding existing intellectual property assets or that may be created, directly or indirectly by the company's employees in the performance of their duties, even if not related to the development of research and innovation, are the exclusive property of FURUKAWA ELECTRIC LATAM.

The intellectual property of third parties must be respected, including copyrights, patents, and original documents. Only use of official software copies will be allowed on company computers.



4.1.8 CONFIDENTIALITY AND SECURITY OF INFORMATION

Confidentiality of all company strategic information must be kept such as, for example, commercial proposals, price lists, client list and information, ongoing projects, financial information, sales plans, costs, employees and third parties information, among others. Only authorized personnel may forward referred information to third parties.

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

Passwords and other access codes to the company's internal systems are individual and non-transferable.

In public places, attention must be doubled when talking about company business or exposing company information in printed or digital documents. The same applies at conviviality locations within the company, such as cafeteria, meeting rooms, hallways and others, as the presence of third parties is common at such places.

Clients and suppliers are only allowed in administrative rooms with authorization from top management, or upon events in which the supplier holds confidentiality agreements with the company.

Third party access to production and stock areas must be accompanied by a person in charge and only through previous authorization of a manager or the labor safety area. Photographs or footage within referred areas may only take place upon authorization of at least one member from the Top Management or from the Human Resources General Manager or from the unit industrial manager.

It is necessary, within the company, to be alert to the circulation and exposure of emails and confidential documents, not leaving them exposed on work tables or computer screens. Confidential documents must be stored in drawers with lock and computer screens must be blocked when the employee leaves the station.



4.1.9 CONFLICT OF INTERESTS

Conflict of interests exists when an employee uses his/her influence or incurs in acts intending to obtain private benefits, that are against company interests or that may cause damages or losses to the same. Conflicts of Interest also arise when an employee, or their immediate family member, receives inadequate personal benefits because of their position in the company.

Employees and their direct relatives must avoid any business action or relation that may establish conflict of their own interests and those of the company. Employees must not render personal activities in consulting or technical assistance to suppliers, clients, service performers and competitors of Furukawa, and must also refrain from corporate participation in referred companies. They must also not engage in parallel activities, have other employment contracts or service provision, which conflict with the working hours at Furukawa, or which interfere with their attention and availability to the company.



4.1.10 POSTURE IN THE MEDIA, PRESS, PROPAGANDA, AND PUBLIC PRESENTATIONS

All company communications must only be carried out by persons authorized or designated for such. Communications must be clear, true and accurate. Communications to the press, authorities, public organs, and third parties, as well as granting interviews on behalf of the company, by employees, may only be carried out through prior approval of the Communication and Marketing area or of top management of Furukawa.

Employees must not publish or disseminate content on social networks that contain defamatory statements of the company or of competitors, that may negatively impact the company's image, which depreciate employees or are in any way discriminatory, contain information considered strategic or sensitive by the company.

Similarly, such employees must not publish or disseminate content that can be interpreted wrongly as the company's positions, which are not consistent with the culture, values and objectives of the company or that violate user licenses rights, copyrights, trademarks or patents without express permission of the company.

4.1.11 AGREEMENTS AND ACCOUNTING RECORDS

The company's accounting documents and records, created by the same or under its responsibility, must be complete, be accurate, updated, and must honestly reflect each credit and debt entry, not admitting any type of payment or collection without the respective record (ex.: Slush fund), or furthermore any record not reflecting valid operation of the company (ex.: money laundering) thus ensuring compliance with anti-bribery legislation and Furukawa policies. It must also be set up on time and in accordance with applicable accounting rules.

In line with the ESG, the Board and the Furukawa Compliance Committee have among their objectives and as part of excellence in corporate governance, ensuring the credibility of accounting and financial reports. Any attempt to damage such credibility will be considered contrary to this code and subject to punishment according to its gravity.

4.1.12 HUMAN RIGHTS

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

Therefore, Furukawa adopts actions to promote activities that respect human rights, in addition to taking all necessary measures to prevent any action that impacts such rights within the organization.

4.1.13 SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

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

In addition to complying with the labor legislation applicable in the places where it operates, Furukawa's basic principal is not to purchase products or services from suppliers who are known to use child labor, forced labor or slavery-like labor.

The company also encourages the participation of its employees in activities of a social nature, in volunteer work and others that aim to improve the quality of life of citizens and the community.

The environment is in Furukawa's DNA. Therefore, in addition to complying with applicable environmental legislation, Furukawa works for a more sustainable future, prioritizing the SDG, which most identify with its strategies, through initiatives that unfold from each of them to promote rational use of natural resources, the preservation of the environment, recycling and the reduction of waste generated in production processes.

Thus, looking to the more sustainable future we want for the planet and for Furukawa, we design the paths to be followed in the company in total harmony with the strategies and objectives of the business.



4.1.14 ADDITIONAL REQUIREMENTS FOR MANAGERS

Furukawa managers must adopt additional care regarding their conduct and the conduct of those being led. Employees must be selected for their qualifications and adequacy to the position; provide precise instructions, especially in complying with law; clearly communicate the importance of ethics and integrity and encourage their employees to use the code of conduct as a reference for their day-to-day; monitor compliance with company guidelines, compliance with laws and requirements of this code; as well as communicate that violations of this code are unacceptable and will imply disciplinary actions, in addition to legal consequences.

Managers must also setup goals that are challenging but, at the same time, can be fulfilled, such as assessing the performance of their employees and apply the meritocracy principle. They also must lead their team with frankness, professionalism, politeness, respect, and fairness, and be accessible and willing for frank and constructive dialog.



4.2 EXTERNAL RELATIONS

4.2.1 RELATIONS WITH SUPPLIERS AND BUSINESS PARTNERS

As part of the corporate governance system in full alignment with ESG practices and in line with the SDG, FURUKAWA ELECTRIC LATAM's suppliers and business partners must comply with all the guidelines established in the Furukawa Code of Conduct for Suppliers and Business Partners (POL000015).

Furukawa employees must evaluate the qualifications and reputation of suppliers and business partners prior to contracting (through due diligence), checking whether same understand and comply with the principles of our company. Employees must also follow up on suppliers and partners activities, so as to ensure their compliance with ethics and integrity principles.

Furukawa employees must not use suppliers and partners, under any circumstance, to incur in any illicit activity or which is against the requirements of this Code of Conduct.

4.2.2 RELATIONS WITH COMPETITORS

Employees and third parties acting on behalf of Furukawa must repudiate all actions that may be considered as anti-competitive, monopolist, or contrary to international, national, or local laws that control market competition practices. That includes, for example, relating with competitors to establish agreements as to prices, production capacities, non-competition, forward bogus offers, market sharing, sales territories, production schedules and any other actions that eliminate sound competition. Nor should these obtain and use confidential information from competitors.

These principles and actions are fundamentally aligned with ESG and SDG practices. In case of doubts about these or other issues related to business processes, the company's Compliance and Legal area must be consulted in advance.

4.2.3 RELATIONS WITH GOVERNMENT AND PUBLIC AGENTS

The company and employees and third parties acting on behalf of FURUKAWA ELECTRIC LATAM must comply with applicable law and ethical principles of this code in the relations established with public agencies in general, as well as establishing relations with authorities and public agents guided by ethics, professionalism and transparency, immediately reporting to the company any manner of pressure, offer or solicitation by public agent, contrary to these principles.

No offer of gifts, presents or any kind of financial advantage or not must be offered to any government official, persons related to the latter, as counterpart to particular or to Furukawa benefits. Also, there must be no use of an individual or corporate intermediary to hide or conceal interests or the identity of those that come to benefit from any unlawful acts committed.

In the event of meeting and/or encounter with public agents, there must always have participation of at least two (2) Furukawa employees. Any payment to be carried out to Government Agents must comply with law and with relevant approval procedures.

Company employees are expressly forbidden, in agreements and bids with Public Power, to sign agreements or previous consents with competitors, aiming at fraud of the competitive nature of the bidding procedure established by applicable law and norms, as well as refrain from fraud to any bid or resulting agreement, including practices aiming at unlawfully defeating competitors, inclusive through offer of any type of advantage. In the same manner, employees must not adversely interfere in any activity regarding investigation or inspection by any entities, public organs or agencies, or intervene in their acting.



4.2.4 GRANTING OR RECEIVING BENEFITS

Employees that participate in meals with suppliers or clients to deal work matters, at locations outside the company, must previously inform the area manager. The manager must determine whether there is need for another Furukawa collaborator to also be present. In the event of meals in which any public employee participates, check the rule defined in item 4.2.3 above that requires at least two participants.

Employees and third party acting on behalf of Furukawa must not incur acts of liberality at the expense of the company, not offering nor receiving, directly or indirectly, from any individual or organization, bribes or any other manner of personal favor or favor for the group's business. Referred acts of liberality include lunches or dinners, show and/or travel tickets, and must promptly report any suspicion of anti-bribery law violation applicable or of group policies, so that any violations or suspected violations are resolved quickly and promptly.

4.2.5 DONATIONS, CONTRIBUTIONS, AND SPONSORSHIPS

Donations will only be allowed upon being clear, tax deductible and, at any time, be able to justify its reason and destination, according to specific internal procedure on the matter.

Donations to individuals, political parties, candidates to public positions, or to any type of political campaign, religious institutions, and any type of institution that represents a risk of undue application of donated resources or furthermore risks to the reputation of Furukawa, are not allowed. Donations through deposit in private accounts are also not allowed.

All contributions in the manner of sponsorship must be clear, be based on a written agreement, bear a legal business purpose and be adequate to the offered compensation. Promising, offering, or providing contributions aiming at ensuring competitive benefits that cannot be justified, is not allowed, and no contributions can be carried out to events organized by people or organizations with objectives incompatible with our corporate principles and/or that may prejudice Furukawa's reputation.

4.2.6 GIFTS AND PRESENTS

Aiming at avoiding any wrongful interpretations that may 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.).

Furukawa employees are only authorized to accept or grant gifts and presents whose maximum value is equivalent to USD75,00 (seventy-five dollars) in local currency, as long as in compliance with applicable legislation.

Receipt of gifts or presents must be done exclusively on the company's premises, and receipt in any other location is prohibited. Exceptions are accepted for cases where the employee is working in a teleworking regimen, where the gift or gift can be received at their residence, provided they are in agreement and always keeping their manager informed of this situation.

If gifts or presents of greater value are received, they must be forwarded to the Human Resources Department, which must inform the Compliance Department and define its destination and may be returned to the sender.

Supplying gifts of low value, distributed as institutional propaganda and with general distribution, must be approved in accordance with the limits defined by the company in specific procedure.

Receiving or granting any amount (cash) is not allowed.



CODE OF CONDUCT VIOLATIONS

The Compliance Committee is responsible for ensuring compliance with this Code of Conduct, as well as all the company's managers in their various units and departments.

Upon any violation of any item of this Code that requires clearance of the facts, a specific Committee will be setup for this purpose. Referred Committee will have sufficient autonomy to carry out its functions and its members will receive assured protection, guaranteeing there will be no arbitrary penalties resulting from exercise of their attributions.

Violations of this Code of Conduct are subject to disciplinary actions in accordance with the event's severity, and may involve warning or contractual rescission, inclusive for just cause when applicable. Regardless of the penalties to be assessed, if any attempt or act of corruption, bribery, or misconduct is evidenced, referred act will be immediately communicated to the pertaining public authorities for legal actions.

Each employee is responsible for formally communicating any possible violation of the terms of this Code. Employees and/or third parties that are aware of any transgression and does not report such, will be deemed as accomplice of the offender.

Communication may be through one of the following options:

- 1) Directly to the immediate superior.
- 2) Directly to the Compliance area.
- 3) Through the direct Ethics Channel number: **0800 600 3250** (Brazil only).
- 4) Through the Ethics Channel website, with link available on the Intranet and at the Furukawa website.
- 5) By e-mail: compliance@furukawalatam.com

All reports received will be treated with confidentiality and secrecy, with the exception of those where there is a legal obligation to inform government authorities. Protection against retaliation to the whistleblower is ensured.

Furukawa will, whenever necessary, report any unusual operation in accordance with the requirements of the legislation of the countries in which it operates. Likewise, if it is identified that the company has been the victim of any unlawful or illegal act, the appropriate report will be made to the applicable competent authority.

DOUBTS

In case of consultations, doubts or suggestions, employees or third parties must contact the Furukawa Compliance area, in person, by phone or email.

COMMITMENT TERM

The President, Directors, management members, employees, and trainees are responsible for knowing, accepting, respecting, and disclosing the information of this Code of Conduct, in addition to endeavoring regarding strict compliance with its provisions. They must also be attentive to prevent and detect violations of this Code, communicating any violation of such to the company.



Infrastructure for life



COMMITMENT TERM

I HEREBY DECLARE being aware and understanding the provisions set out in the Code of Conduct of FURUKAWA ELECTRIC LATAM, set up on January 2022, which establishes, among other matters, the rules for relations with Public Power, whose copy was to me delivered herein, and that I undertake to respect, upon performing my activities, in all its terms, conditions, and ethical principles.

I furthermore hereby declare that upon doubt or awareness of violations to this code and applicable laws, I will promptly report to the Compliance Department, directly or via one of the available channels.

City and date

Name

ID

Signature