

30 September 2015

To: All staff of FAL, FPO & VRO

Export Security Trade Control Policy

1. Purpose

In line with Japan Head Office's Security Trade Control Regulation, FAL is implementing an Export Security Trade Control Policy with the intention of proper enforcement of security trade control based upon applicable laws in Singapore and Fujikura Limited's Security Trade Control Regulation.

2. Fujikura's Security Trade Control Regulations

Fujikura Limited's Security Trade Control regulations (or "FJK STC Regulations") aim towards maintenance of global peace and trade security.

FJK STC Regulations advocates that the company do not pursue business activities (sale or transfer goods and technology) that will lead to destructive act or hinder the achievement of global peace and security, in the international community.

3. Applicable Laws and Regulations

FAL is to make reference to the Strategic Goods (Control) Act and Strategic Goods (Control) Regulations and all related notices applicable in Singapore.

In addition, reference is to be made to the Chemical Weapons (Prohibition) Act, United Nations Acts and other related acts and notices, as needed.

4. Communication & Reporting Structure

When you encounter a business enquiry contradicting to FJK's STC Regulation, report it to:

(a) Enquiry from M1, VRO: Mr Lim Wee Lee (email: weeleel@fal.com.sg).

(b) Enquiry from M2, Business Development: Mr Chia Yew Kwong
(email: chiayk@fal.com.sg).

(c) Enquiry from FPO: Chief Rep., Mr Wasa (email: atsushi.wasa@fujikura-asia.ph).

For further clarification, HOD may channel enquiry to Japan Head Office's appointed Security Trade Control Officer, Ms Yoshiko Yambe (email: yoshiko.yambe@jp.fujikura.com).

5. Appendix

Security Trade Control Regulations Agreement.

Approved by:



Mr T. Takahashi
Managing Director

SECURITY TRADE CONTROL REGULATIONS

Article 1. Purpose

These Regulations are set forth with the intention of properly enforcing Security Trade Control, based upon applicable laws and Fujikura's corporate policy, for the purpose of maintenance of global peace and security (hereinafter called as the "STC Regulations").

Article 2. Basic Policy

The Company shall export or transfer controlled goods, etc. (i.e. Strategic Goods, Strategic Goods Technology, and Catch-All-Control goods or technology) in accordance with the procedure as required by applicable Singapore laws and the STC Regulations. In performing business activities in the international community, the Company shall not pursue any transaction, which, although not legally controlled, will likely hinder achievement of the purpose of the STC Regulations.

Article 3. Related Laws and Regulations

The STC Regulations are set forth based upon the Strategic Goods (Control) Act ("SGCA") and Strategic Goods (Control) Regulations ("SGCR") and their related orders, circulars and notices in Singapore. The Company shall also make reference to the Chemical Weapons (Prohibition) Act, United Nations Acts and other related acts, and their related regulations, orders, circulars and notices, as needed.

Article 4. Definitions

For the purpose of the STC Regulations, the following terms shall have meanings as stated below:

- (1) "country" shall include territory when deemed as appropriate;
- (2) "export" shall mean taking any goods out of Singapore by land, sea or air transportation, including placing the goods on board an outbound vessel. However, this explicitly excludes taking the goods out of Singapore as transshipment or transit goods;
- (3) "Export" shall not only mean any export (including re-export), but also include transshipment, transit, or brokering of goods;
- (4) "transshipment" shall mean unloading any goods in Singapore and reloading them bound for a foreign country on a through B/L, through air waybill or through cargo manifest;
- (5) "transit" shall mean bringing any goods into Singapore from a foreign country in a vessel or other means of transport and taking them out in the same vessel or means without unloading in Singapore. Transit shall not include the passage of such goods through Singapore's territorial waters or air on board a vessel or aircraft of foreign registry in compliance with international laws;

- (6) "brokering" shall mean any contractual act of involvement in Singapore in a transaction for transferring any goods or technology from one country to another;
- (7) "technology" shall include software;
- (8) "transfer of technology" shall mean transferring any technology to an individual or entity in a foreign country by means of export, transshipment, transit, brokering, etc.
- (9) "Goods" shall mean any goods and / or technology;
- (10) "Strategic Goods" shall mean any goods listed on the strategic goods control list and goods not listed on the strategic goods control list under the SGCA if they are intended for WMD and any relevant activity.
- (11) "Strategic Goods Technology" shall mean any technology listed on the strategic goods control list and goods not listed on the strategic goods control list under the SGCA if they are intended for WMD and any relevant activity..
- (12) "List Control" shall mean a system that requires the approval by STC officer for the export, transshipment, or brokering of Strategic Goods, or transfer of Strategic Goods Technology;
- (13) "weapons of mass destruction (WMD)" shall mean any nuclear, chemical or biological weapons, or any missile that delivers such weapons;
- (14) "Development of WMD" shall mean
 - (i) the development, manufacture, handling, operation, maintenance, storage, detection, verification or dissemination of any nuclear, chemical or biological weapon; or
 - (ii) the development, manufacture, maintenance or storage of any missile capable of transporting the above-enumerated weapon;
- (15) "Catch-All Control" shall mean the end-use control for the nonproliferation of WMD or the development of conventional weapons, for which the approval by STC officer is required for the export, transshipment, transit, or brokering of any goods or transfer of any technology thereof that are/is subject to Catch-All Control, in the event that the exporter concerned
 - (i) knows,
 - (ii) has reasonable grounds for suspecting, or
 - (iii) is notified by home government or by Fujikurathat such goods or technology will likely be used for Development of WMD or development of conventional weapons;
- (16) "Catch-All Control goods or technology" shall mean any goods or technology other than the Strategic Goods and Strategic Goods Technology;
- (17) "destination" shall mean the country where the final port for unloading export goods is located. However, if such goods are clearly known to be consumed or processed in a country other than the final unloading country, the final destination or country of destination shall be the consuming or processing country. If the consuming country is known to be different from the processing country, then the final destination or country of destination shall be the consuming country;
- (18) "STC" is an abbreviation for Security Trade Control.

Article 5. Transactions subject to STC

The following Company transactions shall be subject to Security Trade Control:

- (1) Transactions subject to List Control
The export, transshipment or brokering of Strategic Goods or transfer of Strategic Goods Technology specified under the SGCA.
- (2) Transactions subject to Catch-All Control
The export, transshipment, transit or brokering of any of goods or transfer of any technology, other than Strategic Goods or Strategic Goods Technology, that are/is likely to be used for Development of WMD or development of conventional weapons.
- (3) Specially controlled export for any country specified in Circulars issued and to be issued from time to time.
- (4) UN-sanctioned transactions (applicable to UN-sanctioned countries)
Any transaction sanctionable by the United Nations Security Council.

Article 6. STC Officer

1. The Company shall appoint a person responsible for STC management (hereinafter called as "STC Officer") to facilitate the smooth and proper execution of STC operations..
2. The STC Officer shall perform the following respective functions:
 - (i) Formulation of the STC Regulations and proposal of revision thereof:
 - (ii) Formulation of the STC Operational Procedures and revision thereof:
 - (iii) Screening and approval of transaction:
 - (iv) The issuing of instructions, information or requests for thorough internal compliance
 - (v) Internal audit
 - (vi) Education
 - (vii) Guidance and support to subsidiaries and affiliates
 - (viii) Counter work for government offices

Article 7. Destination Check

Upon receipt of an inquiry for the Export of any goods or transfer of any technology, the Business Manager shall check whether or not the intended destination falls among the countries specified in the applicable orders and regulations relating to the SGCA.

Article 8. Classification and Check of Goods

Prior to the Export of any goods or transfer of any technology, the Business Manager shall obtain the Classification Sheet (Form A) from the technical section to check and determine whether the goods or technology fit into the categories of Strategic Goods or Strategic Goods Technology.

Article 9. End-Use Verification

Upon receipt of an inquiry for the Export of any goods or transfer of any technology, the Business Manager shall check whether or not the goods or technology inquired for

- (1) will or is/are likely to be used for the Development of WMD or
- (2) will or is/are likely to be used for any military purpose other than the Development of WMD.

(See Form B)

Article 10. End-User Verification

Upon receipt of an inquiry for the Export of any goods or transfer of any technology, the Business Manager shall check whether or not the counterparty or the intended end user

- (1) appears in the lists as specified in any applicable act and its regulations and orders.
- (2) is known to be or have been, or likely to be or have been engaged in the Development of WMD or
- (3) is known to use or have used, or likely to use or have used the goods and technology for any military purpose other than the Development of WMD.

(See Form B)

Article 11. Preparation, Submission and Approval of Transaction Screening Sheet

1. If the Export of any goods or the transfer of any technology falls under any of the following categories, the Business Manager shall fill out a Transaction Screening Sheet (Form C) upon receipt of an inquiry for such Export or transfer, and request that the STC Officer screen the transaction:
 - (1) The transaction item is classified as Strategic Goods or Strategic Goods Technology under Article 8;
 - (2) The transaction fits into one of the destinations under Article 7, one of the end use under Article 9, one of the end users under Article 10;
 - (3) The Company is notified by authority that a permit or license required for the transaction;
 - (4) It is not clear whether the goods or technology is classified (1) above or whether the transaction is subject to (2) above.
2. The Transaction Screening Sheet shall be filled in with the destination, designation of the goods or technology, classification results, end use, end-user's name and other items, and attached with the documents necessary for the screening. Also, with respect to domestic transactions, the procedures under Paragraph 1 above shall be followed if the goods or technology are/is known to be intended to export or transfer.
3. The approval of the transaction in connection with STC shall be issued by the STC Officer, without which the Business Manager shall not proceed with the transaction.
4. Even in the case of domestic transaction, when (i) it is apparent that the transaction items will be exported, or (ii) they are/likely to be used for any military purpose (including terrorism)

within the home country, the procedure under this Article shall be applied.

Article 12. Confirmation for Shipment

1. The Business Manager shall confirm if the Goods being exported are the same as those stated in the related documents by checking the contents of the relevant sales/purchase contracts, shipping instructions, etc., and the documents prepared by the Company for customs clearance. Furthermore, prior to clearance of the Goods through customs, the Business Manager shall re-ensure either that an export permit has been obtained or that no such permit is required.
2. If any trouble occurs during clearance of the Goods through customs, the Business Manager shall immediately halt the shipment and report the trouble to the STC Officer, whereupon the STC Officer shall confer with the Business Manager and take appropriate measures.

Article 13. Internal Audit

The STC Officer shall conduct a regular internal audit to ensure that STC is being properly performed internally pursuant to the STC Regulations. If any such audit finds a breach of any regulation in connection with the Export of any goods or transfer of any technology, the STC Officer shall initially report the details of such breach to the President, as well as its cause and measures to prevent its recurrence.

Article 14. Education

The STC Officer shall plan education and provide it to all officers and employees of the Company to ensure that all concerned understand the importance of and carry out compliance with applicable laws and the STC Regulations.

Article 15. Preservation of Documents and Recording Media

Documents and recording media concerning all exports, transshipments or transits of goods and the transfers of technologies shall be retained for at least 7 years from such exports, transshipments, transits or transfers.

Article 16. Guidance to Subsidiaries and Affiliates

The STC Officer shall provide subsidiaries or affiliates that export goods or transfer technology with guidance fitting their realities with regard to their STC.

Article 17. Reporting

1. If an officer or employee finds an event in breach of or in likely breach of any applicable law or the STC Regulations, he or she shall promptly inform STC Officer of any such event.
2. The STC Officer shall investigate the informed event, and upon finding any actual breach, shall give instructions to the concerned departments within the Company as to the necessary

measures to be taken.

Article 18. Penalties

An employee who breaches the STC Regulations as well as other persons related to any such breach shall be subjected to penalties under the Working Regulations of the Company.

Supplementary Provision: The STC Regulation shall take effect on DD/MM/YY.

DATE : 27 Mar 2013

NAME : Mr. Lim Wee Lee
STC OFFICER

TITLE : Senior Manager

COMPANY NAME : Fujikura Asia Ltd

Established: 01 Jul 09
Revised: 27 Mar 2013

