

9th January 2015

To: All staff of FAL, FPO, VRO

### **Fujikura Asia Limited Anti-Corruption Policy**

The directors and employees of Fujikura Asia Limited and its representative offices (hereinafter called "FAL," and when referring to the directors and employees of FAL as "FAL Members") comply with applicable laws and regulations related to the prevention of bribery in all countries and areas where FAL conducts business activities (hereinafter "Anti-Corruption Laws"; the term Anti-Corruption Laws includes, but is not limited to, each country/area's Criminal Law, Unfair Competition Prevention Act, FCPA, Bribery Act 2010, and the like; in addition to the relevant country/area's laws and regulations, the term Anti-Corruption Laws also includes the situation where another country/area's laws and regulations, are applied extra-territorially or on some other basis).

FAL Members are required to comply with the FAL Anti-Corruption Policy (hereinafter "this Policy").

#### **1. Prohibition of Corrupt Practices**

(1) FAL Members and all individuals, companies and parties which act on behalf of FAL as a proxy or based on contracts such as business entrustment contracts (hereinafter "Representatives") shall comply with the Anti-Corruption Laws in all countries and areas where business activities are conducted. FAL Members and Representatives shall not give or receive, etc. money/gifts (hereinafter "Money etc.") to or from public officials etc. or private citizens, in violation of Anti-Corruption Laws, nor collude, induce or assist in the giving or receiving of Money etc., in violation of Anti-Corruption Laws.

(2) FAL shall take necessary measures to make Representatives comply with this Policy.

(3) In accordance with (1) above, FAL Members are prohibited from performing acts with public officials etc. in violation of Anti-Corruption Laws.

Following acts are generally prohibited by Anti-Corruption Laws although the laws may vary according to countries or areas.

For example: Giving or offering or promising to give Money etc. to public officials, state-owned enterprise etc. for the purpose of acquiring improper business profits/benefits.

(4) FAL Members must not perform the acts prohibited in 1(1) and 1(3) above through third parties such as trading companies, local country distributors, agencies, consultants, brokers, local partners of joint enterprises, contractors or clients.

A copy of this Policy should be attached or included in the making of the contracts agreements with the third parties mentioned above.

## **2. Accurate Records**

FAL Members shall comply with generally accepted accounting principles in all cases. Accounting books and records shall be recorded accurately, and they shall not, for any reason, be falsified or cause misunderstanding. Accounting books and records that do not have both necessary and sufficient entries or that does not reflect exact deals, shall not be created.

## **3. Reporting**

Any person(s) at FAL who have knowledge of violations of this Policy and managers who have received reports from those who have such knowledge have an obligation to report it. The reports shall be made to his/her immediate superior and/or to FAL's Code of Conduct Promotion Committee. Reports may also be made anonymously through the whistle-blowing system.

Those who have made the reports shall not be treated unfavorably for making such reporting.

## **4. Role of Managers**

This Policy requires all managers at FAL to play special important roles. They shall recognize their entrusted role to supervise and manage his/her organization and its members accordingly.

## **5. Monitoring**

FAL shall monitor the compliance to this Policy by way of internal audit and the supervision of FAL Members action through managers.

## **6. Penalties and Philosophy of FAL.**

FAL Members who have violated the Anti-Corruption Laws and/or this Policy will be subjected to disciplinary action and/or employment being terminated by FAL Management.

Approved by:



Mr T.Takahashi  
Managing Director