

**Furukawa Electric Group**  
**CSR Procurement Guidelines 4<sup>th</sup> edition**

August 30, 2024

**FURUKAWA ELECTRIC CO., Ltd.**

## Introduction

Based on the Furukawa Electric Group Purpose, the Furukawa Electric Group is promoting ESG management with the aim of improving corporate value (financial and social values) over the medium to long term based on ESG (Environment, Social and Governance ).

To fulfill our corporate social responsibility as a member of society, our Group has established "Furukawa Electric Group CSR Code of Conduct" and are proactively engaged in CSR activities.

In order to promote CSR activities under ESG management, it is necessary to work not only within the Group but also throughout the entire supply chain, including our suppliers. Our Group has formulated the "Furukawa Electric Group Procurement Policy" and the "Furukawa Electric CSR Procurement Guidelines " to encourage our suppliers to promote CSR activities.

In response to the revision of the Code of Conduct of the Responsible Business Alliance (RBA), the world's largest organization promoting CSR procurement activities, we have established the "Furukawa Electric Group CSR Procurement Guidelines (4th Edition)". We would like to ask our suppliers for their understanding and support of these guidelines. We also request that our suppliers inform their suppliers of these guidelines and promote CSR activities. The Group considers its suppliers not only as "Suppliers" who supply products and services "Business Partners", but also "Partners" who create value together. However, in these guidelines, please note that the term "Suppliers" is used instead to make it easier to understand.

About Furukawa Electric Group CSR Procurement Guidelines:

Based on "Furukawa Electric Group CSR Code of Conduct" and "Furukawa Electric Group Procurement Policy", these guidelines summarize the approaches and details which the Furukawa Electric Group expects its suppliers to comply with and work on, referring to the Code of Conduct of RBA (Responsible Business Alliance), which is a corporate organization that promotes CSR in the supply chain, and "Responsible Business Conduct Guidelines" of the Japan Electronics and Information Technology Industries Association (JEITA) and other publications.

"Furukawa Electric Group CSR Code of Conduct"

<https://furukawaelectric.disclosure.site/en/themes/123>

"Furukawa Electric Group Human Rights Policy"

<https://furukawaelectric.disclosure.site/en/themes/203>

"Furukawa Electric Group Procurement Policy"

<https://www.furukawa.co.jp/en/procure/standard.html>

"Responsible Business Alliance (RBA) Code of Conduct"

[https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0\\_English.pdf](https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf)

"Japan Electronics and Information Technology Industries Association (JEITA)

Responsible corporate behavior guidelines"

<https://www.jeita.or.jp/cgi-bin/public/detail.cgi?id=788&cateid=1>

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# 1 LABOR

Commit to respect the human rights of workers and to encourage your suppliers to take the same approach. In these guidelines, “workers” refer to all workers including direct, temporary, migrant, student, contract, and indirect employees, and any other type of worker.

## 1 – 1 Prohibition of Forced Labor

**All workers shall be employed at their own free will, and no form of forced labor shall be permitted. Also, workers shall be guaranteed to freely leave work at any time or terminate their employment.**

### 【Details】

- Forced labor, bonded labor, slave labor, involuntary or exploitative prison labor, and human trafficking labor shall not be permitted.
- No unreasonable restrictions are imposed on access to workplaces, dormitories or residential areas or on the freedom of movement of workers in the workplace.
- Employers are required to provide a written employment agreement in the worker's native language or in a language that the workers can fully understand. For foreign migrant workers, an employment agreement must be provided prior to the worker departing from his or her country of origin and there shall be no substitution of or change(s) in the employment agreement allowed upon arrival in the receiving country (unless these changes are made to meet local law and provide equal or better terms).
- No penalty shall be imposed if a worker gives reasonable notice of resignation / retirement in accordance with relevant local laws and regulations. This shall be clearly stated in workers’ contracts.
- Employers, agents, and sub-agent’s may not hold or otherwise destroy, conceal, or confiscate workers identification cards, passports, work permits, etc.
- Employers shall not require workers to pay recruitment fees or other related fees when the workers are recruited or hired.
- Participants shall maintain documentation on all leaving workers in accordance to local laws and regulations.

## 1 – 2 Young Workers

**Children under the minimum working age shall not be hired. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety. Manage student workers appropriately based on local laws. Employers shall ensure proper management of student workers in accordance with applicable laws and regulations.**

### 【Details】

- Child labor is not permitted. The term “child” refers to any person under the age of

15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

- Employers shall implement an appropriate age verification process of workers using official documents issued by the government, such as identification.
- Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts, overtime, or other hazardous work as required by local law.
- If there are student workers, monitor the training contents, their workplace practices, and the performance according to the learning program.

## 1 – 3 Working Hours

**Working hours, holidays and vacations of workers shall be appropriately managed in order not to exceed the legal limit.**

### 【Details】

- Working hours, including overtime, must comply with local laws and regulations.
- When workers work overtime, they must comply with the relevant local laws and regulations, and follow the instructions of the supervisors.
- Workers shall be allowed at least one day off every seven days.
- Workers shall be granted the right to annual paid leave, maternity leave, childcare leave and rest periods as stipulated by local laws and regulations.

## 1 – 4 Wages and Benefits

**Wages of workers must at least exceed the local minimum wage required by local law and the company shall not make wage deductions that deviate from local laws and regulations.**

### 【Details】

- The calculation and payment of all other benefits, including minimum wages, overtime allowances and statutory benefits, must be in accordance with local wage laws.
- For each pay period, workers shall be provided with understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- Equal pay for equal work and qualification shall be set for all workers.

## 1 – 5 Non-Discrimination/Non-Harassment/Humane Treatment

**Respect the human rights of workers and there is to be no harsh or inhumane treatment including abuse and harassment. All forms of discrimination and harassment related to employment and occupation shall be prohibited, and appropriate preventive measures shall be taken.**

### 【Details】

- There is to be no harsh or inhumane treatment including violence, gender-based

violence, abuse, corporal punishment, sexual harassment, power harassment bullying, public shaming etc.

- In order to establish disciplinary systems and response procedures, etc. and to grasp the facts of inhumane treatment, a grievance or reporting mechanism should be set up and communicated to workers.
- Workers should not be discriminated or harassed in employment, promotion, compensation, training or other opportunities or treatment based on race, national origin, creed, religion, gender, gender identity, sexual orientation, social origin, age, disability, educational background, family status, etc.
- Do not allow workers or potential workers to undergo medical tests that could be used in a discriminatory way.
- Reasonable accommodation shall be provided to the workers who carry out religious practices.
- Reasonable accommodation shall be provided to the workers with disabilities.

## 1 – 6 Freedom of Association and Collective Bargaining

**.In accordance with local laws, respect workers' freedom of association (right of association) and the right of collective bargaining as a means of realizing discussions between labor and management regarding the working environment and wage levels.**

### 【Details】

- Workers shall be able to openly communicate and share ideas and concerns regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.
- The employer should approve workers' representatives for the purpose of collective bargaining, promote voluntary negotiations between employers and workers, and the employer shall not refuse collective bargaining activities unless there are reasonable grounds.
- Respect the right of workers to participate in peaceful assemblies.

## 2 HEALTH AND SAFETY

### 2 – 1 Occupational Health and Safety

**Assess the risks to the health and safety of workers in the workplace and ensure safety through appropriate design, engineering controls and administrative controls.**

### 【Details】

- Identify risks to the health and safety of workers in the workplace and eliminate or reduce such risks and take safety measures.
- Where risks in the workplace cannot be adequately controlled by appropriate design, engineering controls, and administrative controls, workers shall be provided with appropriate, well-maintained, personal protective equipment

with free of charge.

- Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their children and to provide reasonable accommodations for nursing mothers.

## 2 – 2 Emergency Preparedness

**In order to protect the life and physical safety of workers, prepare emergency measures assuming possible accidents and disasters, and should be communicated to workers.**

### 【Details】

- Prepare emergency response measures, including emergency reports, notifications to workers, evacuation methods, response procedures, storage and posting of contact information for emergencies, evacuation drills, installation of appropriate fire detection systems, installation of fire extinguishers, securing of external communications, clear and unobstructed exits, adequate evacuation shelters, stockpiling of emergency medical supplies and recovery plans.
- Plan and conduct evacuation drills for all workers once a year or as frequently as required by local laws and regulations, whichever is stricter.

## 2 – 3 Occupational Injury and Illness

**Understand the situation of industrial accidents and diseases and take appropriate measures.**

### 【Details】

- Encourage reports by workers, classify, record, and investigate injury and illness cases, provide necessary medical treatment, and implement corrective actions to eliminate their causes.
- Establish and operate a system for supporting workers' return to work.
- Follow the necessary procedures for the administration (including participation in industrial accident insurance) in accordance with the local laws and regulations.
- Allow workers to remove themselves from imminent harm, without fear of retaliation.

## 2 – 4 Industrial Hygiene

**Understand the situation where workers are exposed to biologically or chemically harmful substances, noise and odors, and take appropriate measures in the workplace.**

### 【Details】

- Identify the risks to workers' health and safety from smoke, steam, dust, toxic and



poisonous substances, radiation, substances that cause chronic diseases (lead, asbestos, etc.), noise, odors, etc., and take measures to eliminate or reduce such risks (by training for workers, and job rotation, monitoring, etc.).

- Where risks in the workplace cannot be adequately controlled by appropriate engineering and administrative controls, provide workers with appropriate, well-maintained, personal protective equipment free of charge.

## 2 – 5 Physically Demanding Work

**Worker exposure to the hazards of physically demanding tasks is to be identified and controlled appropriately so that they do not lead to disaster or illness.**

【Details】

- Take managerial measures to improve the work environment by identifying tasks including manual material handling and heavy lifting, forceful assembly tasks, prolonged standing, and long hours of repetitive data input, etc.

## 2 – 6 Machine Safeguarding

**Assess the safety risks of the machinery and equipment used by workers and take appropriate safety measures.**

【Details】

- If the use of machinery devices may cause accidents or health problems to workers during work, adopt safety mechanisms called fail-safe, install safety devices or protective walls, and conduct periodic inspection and daily maintenance of machinery and equipment.

## 2 – 7 Sanitation, Food and Housing

**Ensure the health and safety of the facilities provided for workers (such as dormitories, cafeterias, toilets, etc.).**

【Details】

- Provide workers with ready access to clean toilet facilities, safe drinking water, food prepared and stored in a sanitary environment, and a canteen.
- Worker housing such as dormitories must be provided with fire prevention measures, emergency exits and appropriate living environments for storing personal and valuable items.

## 2 – 8 Health and Safety Communication

**Provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to.**

**【Details】**

- Health and safety information provided for workplace hazards such as mechanical, electrical, chemical, fire and physical hazards should be clearly posted in the facilities or places accessible to workers, and informed and raised their awareness.
- Health and safety education should be provided to all workers prior to the beginning of work and regularly thereafter.
- Establish a communication process and allows workers to raise any health and safety concerns without fear of retaliation.

## 2 – 9 Healthcare of Workers

**Manage appropriate healthcare for all workers.**

**【Details】**

- In order to prevent and detect diseases of workers at an early stage, conduct medical checkups, etc., as prescribed by relevant local laws and regulations. In addition, sufficient consideration should be given to the prevention of health problems due to overwork and mental health care, etc. Dispatch of health-related information and training should include contents that specify risks related to gender, age, etc.

# 3 ENVIRONMENT

## 3 – 1 Environmental Permits and Reporting

**In accordance with relevant local laws and regulations, obtain approvals from the government if necessary, and comply with required operational and reporting requirements.**

**【Details】**

- Comply with the relevant local laws and regulations regarding the environment. (In Japan, there are "Waste Disposal and Public Cleansing Law" and "Act on Rationalizing Energy Use".)
- Strictly comply with local laws and regulations regarding the obligation to appoint a person in charge of managing poisonous and harmful substances, specified chemical substances, hazardous substances, etc., according to the chemical substances used in the business.
- Depending on the type of business and factory location, comply with relevant laws and regulations, such as environmental impact assessments and

government approvals for facilities handling hazardous materials. .

## 3 – 2 Pollution Prevention and Resource Conservation

**Set voluntary goals for resource and energy conservation, and continuously make effective use of resources and energy, as well as implement activities to reduce environmental impact, such as reducing pollutants and waste.**

### 【Details】

- Carry out conservation activities for natural resources (water, fossil fuels, minerals, etc.) by reducing their use through material substitution, recycling and reusing, and improving methods and processes for manufacturing, maintenance, and facility operation.
- Reduce pollutants and generation of waste by controlling their sources or installing equipment that prevents pollution, and by improving methods and processes for manufacturing, maintenance, and facility operation.
- Reduce the amount of materials used in products and waste, promote the use of recycled resources and parts, and make effective use of resources. The 3Rs (Reduce, Reuse, Recycle) are effective in reducing waste.

## 3 – 3 Hazardous Substances

**In compliance with relevant laws and regulations, identify chemical substances, waste and other substances that are hazard to humans or the environment, and manage them appropriately (tracked and documented, etc.).**

### 【Details】

- Comply with the relevant local laws and regulations related to hazardous substances. (In Japan, there are "Act on the Regulation of Manufacture and Evaluation of Chemical Substances" and "Poisonous and Deleterious Substances Control Act")
- Establish rules regarding identification (including labeling) of chemical substances, safe handling, movement, storage, use, recycling or reuse, and disposal, and manage their operation.

## 3 – 4 Solid Waste

**Comply with relevant laws and regulations, manage waste appropriately(tracked and documented, etc.), set voluntary goals for waste reduction, and continuously reduce waste.**

### 【Details】

- Regardless of whether it is harmful or not, establish rules regarding the identification, classification, storage, transportation, and disposal of waste, and manage their operation.
- Set voluntary reduction goals and plans for waste to ensure that a systematic approach is implemented.
- Continuously work on the 3Rs (Reduce, Reuse, Recycle) to reduce waste.

- Periodically evaluate whether contracted disposal companies and transporters of hazardous wastes are disposing of them by the terms and conditions of the contract.

### 3 – 5 Air Emissions

**Comply with all applicable laws and regulations and take appropriate measures to reduce emissions of hazardous substances into the atmosphere. If necessary, make further improvements based on voluntary standards.**

**【Details】**

- Analyze the contents of hazardous substances (volatile organic compounds, aerosols, corrosive substances, particulates, ozone - depleting substances, combustion byproducts, etc.) and treat them as necessary based on the results, before discharging them into the atmosphere.
- Manage ozone-depleting substances in accordance with the Montreal Protocol and applicable laws and regulations.

### 3 – 6 Materials Restrictions

**For the management of chemical substances in parts and materials used in products and manufacturing processes, comply with applicable laws, regulations and customer requirements concerning the prohibition or restriction of the use of specific substances.**

**【Details】**

- In addition to prohibiting the inclusion of chemical substances specified in applicable laws and regulations in products, ensure compliance with required labeling requirements, conduct tests and evaluations, and manage chemical substances contained in products.
- In addition to controlling chemical substances that should not be contained in products, suppliers shall also monitor the release of chemical substances released into the external environment and report them to the government. In order to reduce the release of such substances, suppliers shall manage chemical substances in its manufacturing processes.
- Chemical substances used in products and manufacturing processes must comply with applicable laws and regulations as well as customer requirements.

### 3 – 7 Water Management

**Comply with all applicable laws and regulations and conduct routine monitoring of the performance of its wastewater treatment before discharging it. In addition, make further improvements based on voluntary standards as necessary.**

**【Details】**

- In addition to monitoring water sources, water consumption, and wastewater volume, suppliers shall work to conserve water resources by conserving and reusing water. Also, conduct water management, including prevention of pollution of the waterways on the premises.
- Monitor the operating status of wastewater treatment systems and emergency response equipment to ensure optimal operation and regulatory compliance.

## 3 – 8 Energy Consumption and Greenhouse Gas Emissions

**Strive to improve energy efficiency and continuously reduce energy consumption and greenhouse gas\* emissions.**

\*Greenhouse gases refer to seven groups of substances: carbon dioxide, methane, nitrous oxide, HFCs, PFCs, sulfur hexafluoride, and nitrogen trifluoride.

### 【Details】

- Establish and report on absolute emission reduction targets regarding greenhouse gas emissions.
- Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported.
- Set voluntary reduction targets, develop plans, and ensure that they are implemented to engage in improvement of energy efficiency (energy conservation) and continuous reduction of greenhouse gas emissions.

## 3 – 9 Conservation of Biodiversity

**Assess the impact of business activities on the ecosystem and make efforts to minimize negative impacts.**

### 【Details】

- In order to minimize the negative impact of business activities on biodiversity in the surrounding areas, identify ecosystem risks inside and outside the premises of business sites and production sites, and implement biodiversity conservation activities appropriately.
- For example, remove introduced species to protect native species, and protect and breed endangered species. Engage in biodiversity conservation activities as an effort across the entire value chain as well as an effort through your products and services.

# 4 ETHICS

## 4 – 1 Business Integrity

**In every aspect of the business, the highest standards of integrity are to be upheld of ethics and moral standards as a top priority. In conducting business activities, the company must fully understand and comply with the relevant laws and regulations of your country and the country in which you operate and respect the international codes of conduct.**

### 【Details】

- Develop a policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement.
- Establish a system for corporate ethics and legal compliance, disseminate information,

raise awareness, and monitor the compliance status.

- Respect the religions, customs, cultures and traditions of each country and region.

## 4 – 2 No Improper Advantage

**Maintain a sound and appropriate relationship with politics and government and refrain from bribery, illegal political contributions, etc. In addition, do not give or receive inappropriate benefits in relation to all stakeholders.**

【Details】

- For the purpose of obtaining and maintaining improper benefits and preferential treatment, do not directly or indirectly entertain, give gifts, give or receive money to or from all stakeholders
- Do not provide improper benefits for anti-social forces (an antisocial individual or groups) that adversely influence social orders or sound corporate activities.
- Do not engage in insider trading involving the buying and selling of a company's stock or other securities based on undisclosed material information related to the business of customers, etc.

## 4 – 3 Disclosure of Information

**In accordance with applicable laws and regulations or general industry practices, disclose information on business activities, products and services to stakeholders in a timely and appropriate manner.**

【Details】

- Information to be provided and disclosed to stakeholders includes details of business activities, financial situation, performance, ESG (Environment, Social and Governance) information, etc. Do not falsify or misrepresent records, or disclose false information noted above.
- Disclose accurate information on the substances contained in the parts and materials used in the products.
- Continuously record management indicators of environmental conservation activities, degree of achieving goals, and other important environment-related matters, and disclose them as necessary.

## 4 – 4 Intellectual Property

**Protect your company's intellectual property, respect the intellectual property rights \*of other companies and do not infringe them those. In addition, appropriately manage and safeguard confidential information\* received from customers, suppliers, etc.**

\*Intellectual property right refers to patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets, etc.

\*Confidential Information generally refers to information disclosed in documents agreed to be confidential or information orally disclosed after notification of confidentiality.

- Do not infringe on the intellectual property rights of others or use or transfer technology or know-how.
- When developing, producing, selling or providing products or services, thoroughly

investigate the intellectual property rights of others in advance and do not use the intellectual property of others without permission unless there are reasonable grounds.

- Do not infringe the copyrights by illegal copying, etc. of computer software or other copyrighted materials.
- Do not illegally obtain or use trade secrets of others.
- Do not illegally or unreasonably obtain, use, disclose or leak confidential information.

## 4 – 5 Fair Business, Advertising and Competition

**Do not engage in any conduct that impedes fair, transparent, and free competition.**

**【Details】**

- In compliance with the competition laws of the applicable country or region (in Japan, there are the Antimonopoly Act and the Subcontract Act, etc.), do not engage in unreasonable restraint of trade, unfair trade practices, abuse of a superior bargaining position, etc..
- Do not impede competition by making arrangements with other companies in the same industry regarding the price, quantity, or sales area of products and services (cartel), by arranging the winning bidder and winning bid price with other bidders (bid rigging), or by engaging in unfair transactions, such as discriminatory treatment of prices and terms, unjust low price sales, and unjust high price purchasing.
- Conduct procurement faithfully and fairly according to the contracts, etc., and do not abuse your dominant position to make unreasonable demands or impose unreasonable obligations on suppliers, such as unilaterally determining or changing the terms of transactions with suppliers, etc., by taking advantage of your position as a purchaser or consigner.
- Do not engage in unfair competition such as obtaining and using trade secrets of other companies in an illegal manner or making false or misleading representations to customers concerning other companies' products.
- In catalogs and other representations and advertisements concerning products and services, do not use expressions that are untrue or misleading to consumers about the contents, nor do they contain content that includes slander or infringement of rights of other companies or individuals.

## 4 – 6 Protection of Identity and Non- Retaliation

Establish a consultation and reporting system that allows workers to raise concerns without fear of retaliation, strive to prevent and detect misconduct at an early stage, ensure the confidentiality of information and the anonymity of whistleblowers, and respond promptly to consultation and reporting cases.

**【Details】**

- Set contact persons for consultation and reporting regarding misconduct and made them known to internal and external parties (the workers of our company and suppliers). Promptly deal with any misconduct and feed back to the whistleblower on the results as appropriate.



## 4 – 7 Responsible Sourcing of Minerals

**Minerals produced in conflict areas and high-risk areas by improper methods and parts made from such minerals shall not be used in the products.**

【Details】

- Establish a policy on responsible minerals sourcing and promote due diligence to clarify whether minerals such as tantalum, tin, tungsten, gold, cobalt, etc. in the products cause or have a part in serious human rights violations, environmental degradation, corruption, conflicts and other incidents in conflict and high-risk areas.

## 4 – 8 Privacy

**Manage and protect the personal information\* of customers, suppliers, consumers, workers, etc.**

\*Personal information refers to information that can identify a specific individual by name, date of birth or other description.

【Details】

- Comply with applicable personal information protection laws and regulations when collecting, using, storing, transferring and sharing personal information.
- Do not illegally or unreasonably acquired, used, disclosed, or leaked personal information.

## 4 – 9 Appropriate Export and Import Controls

**Establish a clear management system, and follow appropriate import and export procedures regarding the import and export of technologies and goods regulated by laws and regulations.**

【Details】

- Take procedures of obtaining permission, etc. as necessary from the regulatory authorities, etc. when importing or exporting parts, products, technologies, equipment, software, etc. that are regulated by laws and regulations based on international agreements (Wassenaar Arrangement, etc.).

# 5 PRODUCT QUALITY AND SAFETY

## 5 – 1 Ensure Product Safety

**Fulfill your responsibility as a supplier by designing, manufacturing and selling products that meet the safety standards stipulated by the laws and regulations of each country and ensure sufficient product safety.**

【Details】

- Design your products to ensure sufficient product safety to fulfill your responsibilities as a manufacturer.
- With regard to product safety, comply with the requirements set forth by laws and



regulations, and also consider the safety required by society.

- In order to ensure product safety, manage traceability (history of standard operating procedures, materials, parts, processes, etc.), and take prompt action to solve problems.

## 6 INFORMATION SECURITY

### 6 – 1 Secure Computer Networks Against Threats

**Take precautions against threats\* on your computer network to prevent harm to your company and others.**

**\*Threats on computer networks include, for example, computer viruses, computer worms, and spyware. If a computer connected to the internet is infected with a computer virus, etc. it may cause a serious loss such as business stagnation involving the entire supply chain, leakage of confidential information or loss of credibility. Cyber-attacks are becoming more sophisticated every year, and since there is no such thing as absolute safety, it is essential to promote continuous protection measures and damage mitigation measures in case of an attack.**

#### **【Details】**

- Take measures to protect your company from threats on computer networks.
- Take measures to mitigate damage to your company in the event of an attack via computer networks.
- For your company's domestic and overseas bases, verify the status of the above-mentioned measures and residual risks, and consider additional measures at least once a year. Also, build a system or framework for this purpose.
- In the event that your company is attacked through a computer network, in order to prevent damage from spreading, promptly share information with the affected customers and business partners.
- After identifying business partners and contractors of critical systems that are particularly important to your company, grasp the status of those countermeasures, and reflect them in your company's consideration of countermeasures.

## 7 BUSINESS CONTINUITY PLANS

### 7 – 1 Formulation of Business Continuity Plans

**Establish a business continuity plan, and in the event of an unforeseen situation, promptly restore important businesses and establish a system to provide a stable supply of products.**

#### **【Details】**

- Business continuity plans should be carefully prepared for the purpose of continuing business in the event of an unforeseen situation, such as a disaster or accident, as part of a company-wide activities and carry out business continuity and early recovery in an emergency.

## 8 MANAGEMENT SYSTEM

Establish and operate a management system for the contents of these guidelines. The purpose of the management system is to ensure compliance with laws, regulations and customer requirements related to business activities and products, compliance with the requirements of these guidelines, identification of risks related to the contents of these guidelines, and prevention, elimination and reduction of the occurrence of risks.

Management system should include the following:

### 8 – 1 Company Commitment

**Post policies for continual improvement regarding the company's "social responsibility" and "environmental responsibility" approved by management in the facility.**

#### 【Details】

- Your company's policies, approved by senior management, are prepared in local languages and in languages understood by workers and are posted in the facility, on the intranet, or in other locations with easy access so that workers can easily view the content.

### 8 – 2 Management Accountability and Responsibility

**Appoint the corporate officers or representatives to ensure the implementation of the management system and related programs, and conduct periodic management reviews by the appointed management representative.**

#### 【Details】

- Appoint management representatives in each of the areas of Labor, Health and Safety, Environment, Ethics, Quality and Safety, Information Security, and Business Continuity Plan, which are described in the related documents (organization chart, job descriptions, management system documents, etc.)
- Conduct management reviews at least annually (once a year).

### 8 – 3 Legal and Customer Requirements

**Establish a mechanism to identify applicable legal and customer requirements, including the requirements of these guidelines, and to monitor compliance.**

#### 【Details】

- Record the monitoring results to understand the applicable legal and customer requirements.

## 8 – 4 Risk Assessment and Risk Management

**Establish a process to identify risks associated with these guidelines, manage identified risks appropriately, and comply with regulations.**

**【Details】**

- Assess the relative significance for each risk and take procedures or physical controls to address the risk.

## 8 – 5 Improvement Objectives

**Develop improvement goals and implementation plans related to these guidelines, and periodically evaluate the achievement of these goals.**

**【Details】**

- Evaluate the achievement of your improvement goals and implementation plans, and also formulate additional action plans if progress is not being made as planned.

## 8 – 6 Training

**Provide training for managers and workers to implement the company's policies and related initiatives and procedures.**

**【Details】**

- Include the content of these guidelines and applicable regulatory requirements in your training. Keep records of the training and evaluate its effectiveness.

## 8 – 7 Communication

**Establish a process to accurately communicate the company's policies, performance, expectations, to workers, suppliers, and customers.**

**【Details】**

- As part of the communication efforts, hold explanatory meetings on these guidelines for suppliers.

## 8 – 8 Worker/Stakeholder Engagement and Access to Remedy

**Evaluate workers' level of understanding of the contents of these guidelines and obtain feedback and examples of violations from workers to establish an effective grievance system to foster continuous improvement. Also, provide opportunities for dialogue with workers, their representatives, and other stakeholders as needed for continuous improvement.**

**【Details】**

- Reports of grievances or violations can be filed anonymously. Workers should be protected from being treated unfairly without fear of retaliation

## 8 – 9 Audits and Assessments

**Periodically assess the status of compliance with applicable laws and regulations, the content of these guidelines and the customer requirements.**

**【Details】**

- Establish and implement self-evaluations and internal audit process to ensure conformity with the content of these guidelines.

## 8 – 1 0 Corrective Action Process

**Establish and implement corrective action processes for nonconformities identified through internal and external assessments, inspections, investigations and audits.**

**【Details】**

- The corrective action process involves developing corrective action plans, managing their progress, and verifying effectiveness after the action is taken.

## 8 – 1 1 Documentation and Records

**Prepare documentation and records in accordance with applicable laws and regulations and the companies own administrative requirements.**

**【Details】**

- Secure and appropriately manage the records of personal and confidential information.

## 8 – 1 2 Supplier Responsibility

**Communicate the contents of these guidelines to your company's suppliers and establish a mechanism to monitor their status of compliance.**

**【Details】**

- Identify your primary suppliers, communicate the contents of these guidelines to them and obtain their consent. Also, monitor the status of compliance to these guidelines and understand the situation.

## 9 CONTRIBUTION TO SOCIETY

**Voluntarily engage in activities\* that contribute to the development of international and local communities.**

\*The activities to contribute to the development of global society and local communities mean the support using company's management resources.

- Social contribution using regular business operation and existing technologies
- Non-monetary social contributions using facilities and human resources, etc.
- Social contribution through monetary donations

### **【Details】**

■ Determine the scope of activities your company can carry out and actively engage in social contribution by cooperation with local communities in the event of a disaster, employee volunteer activities, support for NPO/NGO activities, donation, dispatch of information, etc.

### **Related Guidelines:**

Please also follow the guidelines below for green procurement and quality assurance.

- Furukawa Electric Group Green Procurement Guideline
- Quality Assurance Guidelines for Partners

<https://www.furukawa.co.jp/en/procure/guideline.html>

### **Revisions:**

First Edition: August 30, 2010 Referred to JEITA Supply Chain CSR Guideline

2<sup>nd</sup> Edition: April 8, 2013 Included "Initiatives for Responsible Mineral Procurement"

3<sup>rd</sup> Edition: February 26, 2021 Referred to RBA Code of Conduct 7.0

Changed name to Furukawa Electric Group CSR Procurement Guidelines

4<sup>th</sup> Edition: August 30, 2024 Referred to RBA Code of Conduct 8.0

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