

Furukawa Electric Group Anti-Bribery Statement

Established on April 12, 2012

1. Background and Statement

Furukawa Electric Group has always been committed to anti-bribery compliance throughout its management and operations, and we are continuously determined that the group-wide management of bribery risks is of the utmost importance. However, anti-bribery laws are recently being strengthened internationally and government agencies are increasingly active on their enforcements.

We emphasize once again that it is Furukawa's policy, as is clear from our CSR Code of Conduct, to comply with all applicable anti-bribery laws, including but not limited to, the US Foreign Corrupt Practices Act, the UK Bribery Act, the Japanese Unfair Competition Law and all applicable local laws where the company operates, to prohibit giving and taking of bribery, and to accurately reflect all transactions on company's books and records. Moreover, to fully prevent giving and taking of bribery throughout our operations and maintain the integrity of our business, we also require agents who work on Furukawa's behalf and business partners with whom we do business to comply with these anti-bribery laws.

2. Definitions

"Government Officials" are all public officials, political parties and candidates, including government owned or controlled companies (employees and executives of government owned banks, doctors and researchers of public hospitals, engineers and their delegates of government owned oil companies, etc.).

"Agents" are persons or entities who perform transactions by procuration or perform intercessions or mediations of transactions on behalf of Furukawa Electric Group.

"Business Partners" are persons or entities with which Furukawa Electric Group does business.

A **"Bribe"** is anything of value to a Government Official or other person, with the intent to obtain or retain business or gain an improper advantage. It includes facilitation payments.

3. Requirements

Furukawa Electric Group requires that all its Employees, Agents and Business Partners:

1. Do not give, offer, promise, accept or demand, directly or indirectly, anyone a bribe.
2. Ensure that payments to Government Officials are made according to adequate approval procedures and are reviewed appropriately.
3. Are fully aware of, and comply with the applicable anti-bribery laws and the Furukawa policy through training programs and communication of the policy. Employees, agents and Business Partners are furthermore required to declare compliance to applicable anti-bribery laws and the Furukawa Electric Group policy.
4. Engage only with legitimate and transparent Agents and Business Partners, after performing adequate due diligence procedures on the Agent or the Business Partner.
5. Regularly assess Bribery Risks concerning the business of the company.
6. Maintain record keepings and financial controls to enable demonstration of compliance with anti-bribery laws and the Furukawa Electric Group policy.
7. Regularly review and update its policy and controls where necessary to prevent bribery.
8. Promptly report any suspected violations of the applicable anti-bribery laws or the Furukawa Electric Group policy by any of the Group's Employees, Agents or Business Partners, so that any violations or suspected violations are dealt with timely.