IER Fujikura, Inc.

Code of Business Conduct

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SCOPE

This Code of Business Conduct applies to all representatives, management, and employees of IER Fujikura, Inc. (the "Company"). These individuals are referred to in the Code as Covered Parties.

REPORTING IMPROPER BEHAVIOR

The Company encourages the reporting of suspected or actual occurrences of illegal, unethical or inappropriate events, behaviors or practices.

Employees should promptly report to his/her supervisor any suspected or actual event of illegal, unethical or inappropriate behavior or practice. If an employee is uncomfortable or otherwise reluctant to report to his/her supervisor, then the employee should report the event to the next highest or another level of management. Individuals who are not employed by the Company should promptly report any suspected or actual event of illegal, unethical or inappropriate behavior or practice to the Human Resources Manager or plant management. An event may be reported using one's identity or anonymously. The identity of the individual making the report, if known, shall remain as confidential as possible (depending on the circumstances).

Supervisors who receive a report of a suspected or actual occurrence of illegal, unethical or inappropriate events, behaviors or practices must promptly act to bring the report to the attention of the Human Resources Manager or plant management.

NON-RETALIATION

The Company is committed to providing an environment that allows reporting in good faith, without fear of retaliation or retribution. Anyone who retaliates against an individual who reports an event, behavior or practice in good faith will be subject to discipline including, but not limited to, termination of such retaliating person's relationship with the Company. Anyone who believes they are being retaliated against as a result of his or her report should report the retaliatory behavior to the Human Resources Manager.

RESPECT

We all deserve to work in an environment where we are treated with dignity and respect. The Company is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. The Company is an equal employment employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any Covered Party who feels discriminated against or harassed, or who witnesses discrimination or harassment, should report the incident to their supervisor or Company representative, or to the Human Resources Manager.

NON-DISCRIMINATION AND HARASSMENT

We promote a workplace free from discrimination based on race, gender, age, sexual orientation, disability, or any other status protected by law. Harassment of any kind will not be tolerated. Employees will have the right to report incidents of discrimination or harassment without fear of retaliation.

We are committed to provide equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.

HUMAN RIGHTS

The company is committed to respect and promote human rights. All employees should be treated with dignity and respect, free from discrimination and violence.

MODERN SLAVERY

Employment is at will and free from forced, bonded or compulsory labor or human trafficking.

WOMEN'S RIGHTS

We are committed to promoting gender equality and empowering women in the workplace. Policies will support equal opportunities, equal pay for equal work, career development, and maternity rights.

CHILD LABOR

We prohibit the use of child labor in all forms. Employees must be at least the minimum legal working age of 18. We will take steps to ensure that no child labor occurs in our supply chain.

RIGHTS OF MINORITIES AND INDIGENOUS PEOPLES

We respect the rights of minorities and indigenous peoples, recognizing their unique cultures and contributions. We will engage with these employees to ensure their perspectives and rights are upheld.

LAND RIGHTS AND FORCED EVICTION:

The company is committed to avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

PRIVATE OR PUBLIC SECURITY FORCES:

The company must avoid commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

Working Conditions

Safety and Health**:** We will provide a safe and healthy work environment, adhering to all relevant health and safety regulations. Regular training and resources will be provided to ensure employee well-being.

Facilities: Access to clean drinking water, sanitation, and adequate rest areas will be guaranteed.

Working Hours

Working hours will comply with local laws and standards. Overtime will be compensated at a premium rate and will not exceed the legal limits.

Wages

Fair Compensation**:** We are committed to providing fair wages that meet or exceed local minimum wage laws. Wages will be reviewed annually.

Transparency**:** Employees will receive clear and understandable information regarding their wages, deductions, and benefits.

Diversity, Equity, and Inclusion (DEI)

We value diversity in our workforce and strive to create an inclusive environment where all voices are heard.

Ethical Recruiting

All recruitment practices will be transparent and fair. We will not engage in practices that exploit workers, such as excessive recruitment fees or coercive measures.

Workers will receive a written proof of employment at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

Open Communication

Everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns, working conditions and management practices without fear of reprisal, intimidation or harassment . This is why we follow the "Open Door Policy" as our means of providing the opportunity to discuss any problem. Group leaders, supervisors, the Human Resources Manager, and plant management are available to listen to concerns and to provide guidance. Management has a responsibility to create an open and supportive environment where everyone feels comfortable raising questions.

Conflicts of Interest

Covered Parties must avoid situations where their personal interests could conflict, or appear to conflict, with the best interests of the Company.

A conflict of interest exists when a person's private interest interferes in any way with the interests of the business they are working for. A conflict can arise when a Covered Party takes actions or has interests that may make it difficult to perform his/her work for the business objectively and effectively. Conflicts of interest may also arise when a Covered Party, or members of their family, receives improper personal benefits as a result of his/her position at or with the Company. Loans to, or guarantees of obligations of, Covered Parties and their family members may create conflicts of interest. It is almost always a conflict of interest for a Covered Party to work simultaneously for a competitor, customer, or supplier of the Company.

Outside Activities

Employees of the Company should not engage in outside employment or activities that could have a negative impact on their job performance at the Company, or which are likely to conflict with their work obligations. An employee who performs work for a company with which the Company either does business, or which competes with the Company, must disclose the relationship to his or her supervisor.

Corporate Opportunities

Covered Parties are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information, or position without the consent of the Board of Directors of the Company. No Covered Party may use corporate property, information, or position for improper personal gain. Covered Parties owe a duty to the Company to advance its legitimate interests whenever possible.

Confidentiality

Covered Parties must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized by the appropriate supervisor or manager of the Company or required by law or regulation. Confidential information includes all non-public information that might be of use to competitors or harmful to the business or a customer if disclosed. Confidential information also includes information that suppliers and customers have entrusted to the Company. The obligation to preserve confidential information continues even after employment ends.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire, or seek to acquire, by improper means a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

MEDIA INQUIRIES

From time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the Company, all media inquiries should be directed to the Chief Executive Officer. No one may issue a press release on behalf of the Company without first consulting with the Chief Executive Officer.

CODE OF BUSINESS ETHICS

We will not engage in any form of corruption, bribery, or unethical conduct, whether directly or indirectly. We have a zero-tolerance policy towards bribery and corruption. We are dedicated to preventing money laundering and the financing of illegal activities.

All employees must be vigilant in recognizing and preventing suspicious financial transactions.

- We are committed to verifying the identities of clients, suppliers, and business partners before entering any transactions or partnerships. We will take appropriate steps to ensure that we are not facilitating illegal activities.
- We will monitor all financial transactions to detect and report any suspicious activity. Employees must report any activity that they suspect may involve money laundering or other illegal activities.
- We will require that all employees comply with applicable anti-money laundering laws and regulations, including reporting suspicious transactions to the relevant authorities.

We are committed to upholding anti-trust laws and will not engage in practices that harm free-market competition or violate anti-trust regulations.

- We will not engage in monopolistic practices or attempt to unduly influence or control the market in a way that harms consumers, suppliers, or competitors.
- We will not engage in practices that manipulate or control prices to the detriment of consumers or other market participants.
- We will ensure that our business activities comply with relevant anti-trust laws, including regulations mergers, acquisitions, and market dominance. Employees must immediately report any concerns or suspicions of anti-trust violation.

GIFTS AND GRATUITIES

Employees can not solicit or accept any gift, gratuity, favor, meal, entertainment, reward, or any other item of monetary value that might influence or appear to influence their judgment or conduct in performing their job duties. Employees are allowed to accept gifts or entertainment only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws, and will not influence or appear to influence their judgment or conduct.

Employees with questions about accepting business courtesies should talk to their supervisor or the Human Resources Manager.

OFFERING BUSINESS COURTESIES

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the Company. An employee may never use personal funds or resources to do something that cannot be done with resources of the Company. Accounting for business courtesies must be done in accordance with approved procedures of the Company.

Other than to government customers, for whom special rules apply, we may provide to our customers company logo apparel or similar promotional items. Further, management may approve other courtesies, including meals, refreshments, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature, and is not lavish.
- The business courtesy is properly reflected on the books and records of the Company.

BRIBES, KICKBACKS AND IMPROPER PAYMENTS

No bribes, kickbacks or other improper payments (including payments violating the United States Foreign Corrupt Practices Act), or similar promises can be made, directly or indirectly, by or on behalf of the Company. The following improper business payments and practices are expressly prohibited in the hopes of obtaining business:

- Gifts, gratuities, favors, meals, entertainment, rewards, or any other item of monetary value in excess of nominal value, customary and reasonable practices in the industry, in violation of the any law, or that influence or appear to influence judgment or conduct.

- Illegal corporate contributions, direct or indirect, to any political candidate, party or campaign within the United States or to any foreign political candidate, party or campaign.
- Payments by or on behalf the Company with the intention or understanding that part or all of such payment is to be used for any purpose other than that described by the document supporting the payment.
- Invoicing or any other practice in connection with export or import sales, which involves the intentional filing by the Company of an inaccurate invoice or other corporate document with a foreign or United States governmental agency or instrumentality.

COMPLIANCE

The Company recognizes that it is sometimes difficult to delineate proper standards of ethical conduct. In such instances, Covered Parties should not rely upon their own personal judgment, but should fully and openly discuss the matter with their supervisor, if an employee, or a member of the Company's management. The Company's management may bring further questions concerning the ethics or legality of a particular situation to the CEO who will, if necessary, consult with outside counsel for a determination.

CONCLUSION:

Our commitment to this Code of Conduct reflects our dedication to ethical practices and respect for human rights. We believe that upholding these principles is essential to the sustainability and success of our organization.