

Every employee of America Fujikura, Ltd. and its affiliates, is expected to comply with all laws and regulations related to the export, re-export and import of goods, services or technology including, but not limited to, the Arms Export Control Act, the U.S. International Traffic in Arms Regulations, the U.S. Export Administration Regulations, the various sanction programs enforced by the U.S. Department of the Treasury's Office of Foreign Assets Controls, the regulations of the U.S. Department of Homeland Security's Bureau of Customs and Border Protection, and the specific regulations of each country in which America Fujikura Ltd. operates. It is America Fujikura Ltd.'s policy that under no circumstances will sales or other transactions be made contrary to export or import regulations. Special care should be taken to prevent transactions with entities involved in the proliferation of missiles and weapons of mass destruction, countries under U.S. embargo, and persons or entities that have been identified as restricted.

The Policy applies to all employees at all levels of the Company. This Policy also applies to all transactions, whether the export or import is a small or sample quantity or for a limited duration, whether the transaction is a "re-export" of U.S.-origin product or technology, and regardless of whether the export or import is to or from a related entity to The Company or a fellow employee of America Fujikura Ltd., or its affiliates. Any question concerning the legitimacy of a transaction to potential violations should be referred to the appropriate compliance liaison.

Violation of this Policy will result in appropriate case-specific discipline. Violation of import or export laws and regulations can subject the Company and/or individuals to criminal penalties, including imprisonment, fines, suspension or loss of export privileges and other sanctions.