Human Rights Policy

Purpose

American Furukawa, Inc. (AFI) is committed to respecting and protecting internationally recognized human rights throughout our operations and business relationships. As a member of the Furukawa Electric Group, we support the principles of human dignity, equality, fairness, and respect and align our efforts with the values and responsible business practices promoted by Furukawa Electric Group and by Furukawa AS Group.

AFI supports the principles set forth in the Furukawa Electric Group CSR Code of Conduct, including respect for human dignity, equal opportunity, diversity, equity and inclusion, safe and rewarding workplaces, responsible business conduct, and compliance with internationally recognized human rights standards. AFI seeks to integrate these principles into its operations, decision-making processes, and business relationships.

This policy establishes AFI's commitment to conducting business ethically and responsibly while fostering a workplace where all individuals are treated with respect and provided equal opportunities to succeed.

Scope

This policy applies to all AFI employees, officers, directors, temporary workers, contractors, suppliers, business partners, and any third parties acting on behalf of AFI.

Policy Statement

AFI is committed to upholding human rights in accordance with applicable laws and internationally recognized principles. We do not tolerate discrimination, harassment, exploitation, forced labor, human trafficking, or any other practice that violates fundamental human rights.

AFI respects the inherent dignity, rights, and freedoms of every individual. We are committed to conducting business in a manner that respects internationally recognized human rights and promotes fairness, inclusion, and mutual respect across all aspects of our operations. We strive to identify, prevent, and address potential human rights risks associated with our business activities and relationships.

Respectful Workplace and Prohibition of Harassment

AFI respects the dignity of all people and is committed to maintaining a professional workplace free from:

- Harassment

- Sexual harassment
- Verbal abuse
- Intimidation
- Hostile conduct
- Bullying
- Retaliation

Employees, contractors, suppliers, and business partners are expected to communicate respectfully and avoid language or behavior that may diminish the dignity of others.

AFI will not tolerate conduct that creates an intimidating, offensive, hostile, or unsafe work environment.

Employee Development and Rewarding Workplaces

AFI seeks to create workplaces where employees can develop their talents, achieve professional growth, and experience meaningful engagement in their work.

We strive to:

- Support continuous learning and development.
- Promote work-life balance.
- Provide opportunities for professional advancement.
- Encourage employee participation and engagement.
- Foster a culture of respect, accountability, and collaboration.
- Create an environment where employees can take pride in their work and contributions.

AFI believes that individual growth contributes to organizational success and long-term sustainability.

Child Labor and Young Workers

AFI prohibits the use of child labor in any aspect of its operations or supply chain.

- We will not employ any individual below the minimum legal working age established by applicable laws and regulations.
- We support the protection, education, and development of children.
- Where young workers are legally employed, we will ensure their work is age-appropriate and does not interfere with their education, safety, health, or development.
- Young workers will not be assigned hazardous duties prohibited by applicable law.

Wages, Benefits, and Working Conditions

AFI is committed to fair and equitable compensation practices.

- Employees will be compensated in accordance with all applicable wage and hour laws.

- Wages, overtime pay, benefits, and legally required deductions will be communicated clearly and administered accurately.
- Employees will receive equal pay opportunities based on qualifications, performance, skills, and responsibilities.
- We strive to provide safe, healthy, and respectful working conditions for all employees.

Modern Slavery, Forced Labor, and Human Trafficking

AFI strictly prohibits all forms of:

- Modern slavery
- Forced labor
- Bonded labor
- Involuntary prison labor
- Human trafficking
- Debt servitude

All employment relationships must be voluntary.

We will not:

- Require employees to surrender government-issued identification documents as a condition of employment.
- Restrict employees' freedom of movement.
- Use coercion, threats, intimidation, or other forms of unlawful influence to obtain or retain labor.

Ethical Recruitment

AFI is committed to ethical and transparent recruitment practices.

- Employment decisions will be based on qualifications, experience, skills, and business needs.
- Recruitment processes will be conducted honestly and without deception.
- Workers will not be charged recruitment fees where prohibited by law.
- Employment terms, conditions, and expectations will be communicated clearly before employment begins.
- Candidates will be treated fairly and with respect throughout the hiring process.

Freedom of Association and Collective Bargaining

AFI Group respects employees' rights to:

- Freely associate or refrain from associating with organizations of their choice.
- Form, join, or support lawful labor organizations.
- Participate in collective bargaining where permitted by law.

Employees who exercise these rights will not be subjected to discrimination, harassment, retaliation, intimidation, or adverse employment action.

Women's Rights
AFI is committed to supporting and advancing the rights of women throughout the organization.

We will:
- Provide equal employment opportunities regardless of gender.
- Promote a workplace free from discrimination, harassment, bullying, and violence.
- Support fair access to recruitment, promotion, training, compensation, and leadership opportunities.
- Comply with applicable laws regarding pregnancy, maternity leave, and related workplace protections.
- Foster a work environment where women are treated with dignity, respect, and fairness.

Diversity, Equity, and Inclusion
AFI believes that diversity strengthens our organization and contributes to innovation, employee engagement, and business success.

We are committed to:
- Creating an inclusive workplace where all individuals feel valued and respected.
- Providing equal opportunity in hiring, promotion, compensation, development, and advancement.
- Making employment decisions based on merit, qualifications, performance, and business needs.
- Promoting a culture that encourages different perspectives and experiences.

We do not tolerate discrimination based on:
- Race
- Color
- Religion
- National origin
- Ethnicity
- Sex
- Gender identity or expression
- Sexual orientation
- Age
- Disability
- Veteran status
- Any other status protected by applicable law

Rights of Minorities and Indigenous Peoples
AFI respects the rights, cultures, traditions, identities, and contributions of minority groups and Indigenous peoples.

We are committed to:

- Treating all individuals with dignity, fairness, and respect.
- Promoting equal opportunity and nondiscrimination.
- Recognizing and valuing cultural diversity.
- Supporting an inclusive environment that respects differing backgrounds, traditions, and perspectives.
- Avoiding practices that may adversely impact the rights, culture, heritage, or identity of minority or Indigenous communities.

Safe and Respectful Workplace

AFI is committed to maintaining a workplace free from:

- Harassment
- Discrimination
- Bullying
- Violence
- Retaliation

Employees are expected to treat one another with professionalism, respect, and integrity.

Human Rights Due Diligence

AFI seeks to identify, assess, prevent, mitigate, and, where appropriate, remediate adverse human rights impacts that may arise through its operations, business activities, products, services, or business relationships.

AFI may periodically evaluate human rights risks, investigate reported concerns, implement corrective actions, and monitor improvement efforts to strengthen human rights performance across its operations and supply chain.

Reporting Concerns

AFI encourages employees and business partners to raise concerns regarding potential human rights violations without fear of retaliation.

Reports may be made through management, Human Resources, compliance channels, or other designated reporting mechanisms. All reports will be reviewed appropriately and handled confidentially to the extent possible.

Supply Chain Expectations

AFI expects suppliers, contractors, and business partners to uphold standards consistent with this policy.

Our business partners are expected to:

- Respect human rights.
- Prohibit child labor and forced labor.
- Maintain fair employment practices

- Promote workplace safety.
- Support diversity and equal opportunity.
- Conduct business ethically and lawfully.
- Support lawful wages and working conditions.
- Respect freedom of association
- Prohibit discrimination and harassment

AFI may engage suppliers in dialogue, assessments, corrective actions, or improvement activities where human-rights-related risks or concerns are identified.

Responsibilities

Management is responsible for implementing this policy and promoting a culture of respect, fairness, and accountability. Every employee shares responsibility for upholding human rights and reporting concerns that may conflict with this policy.

Commitment

AFI is dedicated to respecting the dignity and human rights of all people. Guided by our values and our affiliation with Furukawa Electric Co., Ltd., we are committed to maintaining ethical business practices, fostering an inclusive workplace, and supporting the well-being of employees, communities, customers, and stakeholders worldwide.