

The Furukawa Company Group's Code of Conduct for Officers and Employees

Basic Philosophy

The Furukawa Company Group's basic policy is to contribute to diverse stakeholders while increasing corporate value, under its "Management Philosophy": "The Furukawa Company Group will remain indispensable to society by always embracing a spirit of challenge, advancing the technologies that have underpinned the foundation of society that originated in mining development." Based on the above, the Group has, as a responsible corporate citizen, established its "Charter of Corporate Conduct" for the purpose of respecting human rights and complying with laws and regulations while working on environmental conservation activities towards the realization of a sustainable society and carrying out corporate activities that contribute to all aspects of society on a global basis. In accordance with the Charter, officers and employees shall be aware of corporate social roles and responsibilities, and not only act in compliance with laws and regulations and social norms but also in line with values and ethics appropriate for a member of society.

This "Code of Conduct for Officers and Employees" sets forth standards of behavior for the Group's officers and employees in order to actualize the Basic Philosophy.

Scope of Application

This Code of Conduct applies to officers and employees of our company and its consolidated companies. Employees shall include contract employees, temporary employees, part-time employees, dispatched employees, and employees seconded from other companies.

Code of Conduct

<p>1. Providing high-quality products and services</p>
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<p>The Group shall pursue technology development that helps to realize a sustainable society, and it shall provide products and services that satisfy customers.</p>
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- 1 - (1) In all business activities from planning and development to sales, focus on providing products and services that are highly reliable and satisfy customers while placing top priority on quality and safety.
- 1 - (2) Develop technologies that contribute to the realization of a sustainable society, such as manufacturing products that reduce environmental risks, and building a resilient,

high-quality social infrastructure.

- 1 - (3) Procure necessary materials, goods, and services with appropriate quality, prices, and delivery dates based on the principles of fairness and impartiality.
- 1 - (4) Strive to improve productivity, reduce costs, as well as to improve the Group's technological capabilities and pass on its technologies.
- 1 - (5) Conduct fair sales activities and provide a wide range of products and services at appropriate prices.

2. Harmony with the global environment

The Group shall work on reducing environmental risks and pursue corporate activities that are in harmony with the global environment.

- 2 - (1) Comply with environmental standards based on the laws and regulations of each country and, if necessary, establish voluntary standards to protect the environment.
- 2 - (2) Grasp the environmental impact of the Group's business activities and reduce environmental risks by reducing CO₂ emissions, waste emissions, and water consumption.
- 2 - (3) Promote energy and resource conservation in all areas of the Group's corporate activities.
- 2 - (4) Promote safe and efficient maintenance and management of suspended and abandoned mines under long-term plans.
- 2 - (5) Promote efforts to conserve biodiversity while giving consideration to the impact of business activities on the ecosystem.

3. Ensuring compliance

The Group shall engage in its corporate activities in a fair manner based on the ethical values expected of corporations and business persons as members of society.

- 3 - (1) In addition to complying with domestic and international laws and regulations, practice compliance that includes respecting corporate ethics and social norms.
- 3 - (2) Comply with the competition laws of each country and respect fair and free competition.
- 3 - (3) Avoid engaging in bribery and strive to prevent corruption.

- 3 - (4) Conduct responsible procurement that supports the development of a sustainable society through fair and impartial transactions.
- 3 - (5) Comply with trade control laws and regulations to ensure security.
- 3 - (6) Reject any relationship with antisocial forces.
- 3 - (7) Properly manage the Group's confidential information, including personal information, to prevent unauthorized use or disclosure.
- 3 - (8) If a compliance violation has been committed or is suspected, report it promptly and take corrective actions.

4. Highly transparent corporate activities

The Group shall appropriately disclose its corporate information and engage in constructive dialogue with a wide range of stakeholders to build trust.

- 4 - (1) Increase the transparency of corporate activities by disclosing information to stakeholders in a timely, appropriate, and fair manner.
- 4 - (2) Do not engage in insider trading.
- 4 - (3) Engage in constructive dialogue with diverse stakeholders and build relationships of trust.

5. Respect for human rights

The Group shall respect the human rights of all individuals.

- 5 - (1) Do not violate any human rights or tolerate any human rights violations.
- 5 - (2) Do not use or allow any business partners to use child/forced labor.
- 5 - (3) Do not engage in discriminatory treatment or conduct based on factors such as nationality, race, sex, age, creed, religion, social status, or disability.
- 5 - (4) Respect the personalities, individualities, and values of all individuals, and refrain from acts or behaviors that may damage them.

6. Enhancement of work environment

The Group shall establish a work environment that takes into consideration the health and safety of individuals and realize work styles that respect the diverse values of officers and employees.

- 6 - (1) Strive to create a safe and comfortable workplace in compliance with the labor laws

and regulations, and safety and health laws and regulations of each country.

- 6 - (2) Respect diverse personalities, individualities, and values and aim to create a workplace that is rewarding for all officers and employees.

7. Participation in and contribution to society

The Group shall actively participate in society and contribute to its development.

- 7 - (1) Respect the cultures, religions, and traditions of each country and region in which the Group operates its business, and promote public understanding of its management policies and corporate activities.
- 7 - (2) Engage in activities that contribute to society, coexist with it, and contribute to its development.