

GLOBAL QUALITY PHILOSOPHY

Code of Ethics

Furukawa México S.A. de C.V.

Introduction	3
The FURUKAWA AUTOMOTIVE MEXICO Group Philosophy	
Purpose	
Responsibility	
Leadership Has Additional Responsibility	
Walking the Talk	
You and Your Fellow Associates	4
Respect for the Individual	
Personal Information	
Non-Harassment	
Safe, Secure and Healthy Work Environment	
Compensation	
Employment Law	
You, FURUKAWA AUTOMOTIVE MEXICO and Our Customer	6
FURUKAWA AUTOMOTIVE MEXICO Assets	
Government Customers and Entities	
Product Safety and Quality	
You and Outside Business	6
Supplier and Vendor Relations	
Supplier and Vendor Information	
Conflict of Interest	
Providing Gifts and Entertainment	
You, Our Community and the Environment	8
Community Responsibility	-
Environmental Protection	
Political Activities	
You and Business Information	8
Confidential Information	
Insider Trading	
Information Assets of Other Companies	
Business Records and Communication	
Government Requests and Investigations	
Litigation and Claims	
Media Requests	
You and the Law	10
Compliance with all Laws	
Antitrust	
Anti-Corruption Law	
Customs and International Trade	

Financial Reporting	11
Financial Reporting Commitment	
Financial Reporting	
How to Get Help	12
Questions or Concerns	
FURUKAWA AUTOMOTIVE MEXICO Ethics & Compliance Contracts	

The FURUKAWA AUTOMOTIVE MEXICO Group Philosophy

FURUKAWA AUTOMOTIVE MEXICO Group is widely recognized as a global manufacturer of automotive components. Our good reputation is based on more than building high quality automotive parts products for a reasonable price. We pride ourselves in doing the right things in the right way.

From the very beginning, the FURUKAWA AUTOMOTIVE MEXICO Group philosophy has emphasized the obligations we have to our customers, suppliers and communities, to society, our outside stakeholders, and to each other. We will always conduct business lawfully and honestly. Safety, quality, integrity, environmental care and respect aren't just words at FURUKAWA AUTOMOTIVE MEXICO-they are the way we work together.

PURPOSE

The FURUKAWA AUTOMOTIVE MEXICO Compliance and Ethics Business Practices Policy is a guide to the ethical and legal responsibilities of FURUKAWA AUTOMOTIVE MEXICO Group associates. The FURUKAWA AUTOMOTIVE MEXICO Group Compliance and Ethics Business Practices Policy is not a comprehensive rulebook. Some of the responsibilities discussed in the *Policy* may also be discussed in other FURUKAWA AUTOMOTIVE MEXICO Group materials. (For example; the Employee Handbook, Administration policies, and applicable business team or department policies and procedures.)

The FURUKAWA AUTOMOTIVE MEXICO Group (Furukawa Electric North America, Automotive Product Division) is made up of a variety of divisions that all adhere to the guidelines set forth in this policy, and who all share in the visions of our Group Philosophy. Our FURUKAWA AUTOMOTIVE MEXICO Group includes offices in Michigan, Ohio, California and our production facility, FURMEX, located in Mexicali Mexico.

For ease of reference and reading, all divisions making up the FURUKAWA AUTOMOTIVE MEXICO Group will be referred to as FURUKAWA AUTOMOTIVE MEXICO in this policy

RESPONSIBILITIES

No policy or handbook can guarantee good, ethical behavior. But each of us can comply with these polices by making it our fundamental responsibility to always do the right thing the right way:

- Always act in accordance with the law, this Policy and other FURUKAWA AUTOMOTIVE MEXICO policies.
- Treat fellow associates, customers, competitors, suppliers and community members with the respect and fairness that you would like shown to you.
- Report any conduct that may violate the law or this Policy to your supervisor, Human Resources or to the FURUKAWA AUTOMOTIVE MEXICO Ethics & Compliance Officer.
- Cooperate fully in any FURUKAWA AUTOMOTIVE MEXICO investigation.

Meeting these requirements is vital to FURUKAWA AUTOMOTIVE MEXICO success. Therefore, violations of our policies or the law may lead to discipline, up to and including separations of employment.

Retaliation against anyone for making a good-faith report is a violation of this policy and our expectation of respect for the individual. This type of action will not be tolerated.

FURUKAWA AUTOMOTIVE MEXICO is a company with many associates and many customers. Our reputation is built one customer at a time, one person at a time and one action at a time. In the end, the reputation and success of our company depends on you.

LEADERSHIP HAS ADDITIONAL RESPONSIBILITIES

If you supervise others or lead a team, you are expected to provide leadership to assure compliance in your area of responsibility. You must act ethically and communicate, formally and informally, FURUKAWA AUTOMOTIVE MEXICO's high ethical standards to all those reporting to you. FURUKAWA AUTOMOTIVE MEXICO leaders must make every effort to ensure that FURUKAWA AUTOMOTIVE MEXICO standards are being upheld and that associates report any violations of the Business Practices Policy.

WALKING THE TALK

The words in this Policy are empty promises if they are not lived up to by each of us and enforced consistently throughout the company. Since prevention is the best way to minimize problems associated with unethical or illegal conduct, FURUKAWA AUTOMOTIVE MEXICO provides periodic training in ethical and legal responsibilities. FURUKAWA AUTOMOTIVE MEXICO also may evaluate an associate's adherence to this Policy during the annual performance appraisal process.

We recognize that sometimes people make mistakes. If you make a mistake, promptly disclose the error to your leadership. Covering up a mistake only makes the situation worse and would be a serious violation of FURUKAWA AUTOMOTIVE MEXICO policy

FURUKAWA AUTOMOTIVE MEXICO is also committed to promptly investigating allegations of unethical or illegal conduct.

If allegations involve you, you are expected to cooperate fully and tell the truth. You will have the opportunity to tell your side of the story. If you violate this Policy, you are subject to discipline, up to and including separation from the company.

RESPECT FOR THE INDIVIDUAL

FURUKAWA AUTOMOTIVE MEXICO demonstrates Respect for the Individual in many ways. One important way is by providing equal employment opportunities for all. FURUKAWA AUTOMOTIVE MEXICO makes employment decisions without regard to race, color, gender, age, religion, national origin, ancestry, citizenship, disability, veteran status, sexual orientation, social or economic status, or educational background.

Respect also means that FURUKAWA AUTOMOTIVE MEXICO recognizes and values the unique talents of all associates. Valuing diversity leads to a more inclusive, productive and respectful work environment.

PERSONAL INFORMATION

FURUKAWA AUTOMOTIVE MEXICO also demonstrates Respect for the Individual by protecting the personal information of associates. Information such as addresses, home phone numbers, salary or medical information, and performance appraisals are private. This information should never be shared with anyone who does not have an appropriate business reason for receiving it.

NON-HARASSMENT

Harassment, intimidation and abuse are not tolerated at FURUKAWA AUTOMOTIVE MEXICO. It doesn't matter if you are an associate, a supplier, a contractor, a temporary or an affiliate; harassment violates the FURUKAWA AUTOMOTIVE MEXICO belief in Respect for the Individual. FURUKAWA AUTOMOTIVE MEXICO protects the right of every associate to work in a safe and amicable work environment.

Harassment can take many forms, all of them unacceptable. Some examples are:

- Jokes, insults, threats and other unwelcome actions concerning a person's race, color, gender, age, religion, national origin, ancestry, citizenship, disability, military status, sexual orientation, social or economic status, or educational background.
- Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature.
- Verbal or physical conduct that disrupts another's work performance or creates an intimidating or hostile work environment.

If you observe, or are the subject of harassment, intimidation, or abuse, you have a responsibility to yourself, your fellow associates and to FURUKAWA AUTOMOTIVE MEXICO to report it immediately to your supervisor, human resources or the Ethics and Compliance Officer. Retaliation against anyone who objects to, or reports, unwelcome conduct is not tolerated.

SAFE, SECURE AND HEALTHY WORK ENVIRONMENT

FURUKAWA AUTOMOTIVE MEXICO is committed to providing a safe, secure and healthy work environment. Each associate has an obligation to every other associate to ensure safe, secure working conditions. Participate in safety training, comply with all relevant safety codes, regulations, standards and policies, and promptly report any safety concerns, including accidents, injuries and unsafe conditions. Make safety a priority in everything you do.

Possessing or using alcohol or illegal drugs at work, or reporting to work under their influence, is strictly prohibited. It is dangerous to you and an obvious threat to a safe workplace. Violence or the threat of violence, including brining a weapon to any FURUKAWA AUTOMOTIVE MEXICO facility, is also prohibited. To keep FURUKAWA AUTOMOTIVE MEXICO safe and secure for everyone, you are responsible for promptly reporting any safety concerns, including accidents, injuries, unsafe conditions, or threats of violence.

COMPENSATION

FURUKAWA AUTOMOTIVE MEXICO is committed to paying associates fairly. When you perform work authorized by FURUKAWA AUTOMOTIVE MEXICO, you will be paid for all hours worked. You are accountable to accurately record the time you work. Managers are responsible for ensuring that associates receive appropriate compensation for time spent working for FURUKAWA AUTOMOTIVE MEXICO

EMPLOYMENT LAWS

We will comply with laws that apply to our associates, no matter where they are located. Applicable employment laws include immigration laws, the Americans with Disabilities Act, the Family and Medical Leave Act, Discrimination Act, Pregnancy Act, Worker Adjustment & Retraining Notification Act, the Fair Labor Standards Act and Equal Employment Opportunity laws and regulations.

FURUKAWA AUTOMOTIVE MEXICO ASSETS

FURUKAWA AUTOMOTIVE MEXICO has invested millions of dollars in people, plants, equipment and knowledge in order to manufacture world-class automotive components. Properly care for these and all other FURUKAWA AUTOMOTIVE MEXICO assets as if they were you own.

Use FURUKAWA AUTOMOTIVE MEXICO assets solely for company business or for purposes authorized by management. Protect them from theft, carelessness, waste and misuse.

GOVERNMENT CUSTOMERS AND ENTITIES

FURUKAWA AUTOMOTIVE MEXICO treats its customers, including the federal, state and local government, with honestly and fairness. FURUKAWA AUTOMOTIVE MEXICO complies with government procurement laws and regulations.

If you work with government officials or government contracts, you are responsible for knowing and complying with all applicable laws and regulations. For example, many government officials are prohibited from receiving gifts, entertainment and travel. Government regulations also apply to the hiring of current, or recently retired, officials and their families. Avoid any conduct that may be viewed as improperly influencing the objective decision-making of government officials. If you aren't sure, ask.

PRODUCT SAFETY AND QUALITY

Our reputation is riding on the safety and quality of every product we make. Put quality into everything you do, and let your supervisor know of any product or process that does not meet FURUKAWA AUTOMOTIVE MEXICO quality or safety standards. Never attempt to conceal sub-standard work or products. As you think about product safety and quality, remember that people you care about use our products.

SUPPLIER AND VENDOR RELATIONS

Building strong relationships with suppliers and vendors is a big part of building high quality automotive components. FURUKAWA AUTOMOTIVE MEXICO treats its business partners and prospective suppliers fairly. We expect them to treat us the same way.

If you are involved in purchasing activities, make decisions based on sound business reasons, such as suitability, diversity, quality, delivery and cost. Purchasing arrangements should be properly documented, and should clearly identify all material terms and conditions, including the services of products to be provided, price and payment terms. There are many potential pitfalls in identifying potential suppliers and negotiating contracts. Work with the appropriate technical experts, including but not limited to; purchasing, sales, customs, logistics and legal to appropriately assist you.

SUPPLIER AND VENDOR INFORMATION

It is very important to respect the confidential information of suppliers. Never disclose confidential information from suppliers, such as drawings or pricing information, unless it is legally authorized or with the written permission of the supplier.

CONFLICT OF INTEREST

All FURUKAWA AUTOMOTIVE MEXICO associates, officers and directors have a duty to act professionally and make business decisions based solely on the best interests of FURUKAWA AUTOMOTIVE MEXICO. A conflict of interest occurs if you allow the possibility of personal gain to influence, or appear to influence, the conduct of FURUKAWA AUTOMOTIVE MEXICO business. Examples of situations that may cause a conflict of interest are listed below:

- Purchasing good or services that result in direct or indirect compensation to you or a member of your family.
- Accepting gift/entertainment from a supplier during the bidding process.
- Working or consulting for any FURUKAWA AUTOMOTIVE MEXICO supplier or competitor.
- Receiving compensation of any kind, including loans, payments or subsidies, from a supplier or competitor.
- Accepting gifts of more than nominal value, or entertainment that is lavish or unreasonable in the business relationship.
- Accepting special services or discounts from suppliers or competitors, unless these services or discounts are made publicly available to all FURUKAWA AUTOMOTIVE MEXICO associates.
- Owning a significant interest in a competitor, supplier, a company that seeks to become a supplier, or a distributer that sells FURUKAWA AUTOMOTIVE MEXICO or a competitor's products.
- Disclosing information learned through your employment at FURUKAWA AUTOMOTIVE MEXICO that could benefit or influence the stock price of a FURUKAWA AUTOMOTIVE MEXICO competitor or supplier.

Even the appearance of a conflict can be damaging to you, FURUKAWA AUTOMOTIVE MEXICO and our business partners. You should refuse any lavish or frequent gifts, favors or entertainment. You should also inform the supplier of FURUKAWA AUTOMOTIVE MEXICO policy in this area. Any situation that may appear to be a conflict of interest must be reviewed by FURUKAWA AUTOMOTIVE MEXICO management and/or FURUKAWA AUTOMOTIVE MEXICO Ethics and Compliance Officer. If you're even in doubt, disclose.

PROVIDING GIFTS AND ENTERTAINMENT

At FURUKAWA AUTOMOTIVE MEXICO, we pride ourselves on building strong relationships with suppliers and customers. At times it may be appropriate to provide a modest gift or entertainment to a business partner. Any gift or entertainment provided must be legal, in support of a valid business purpose, and in accord with the company policy of the recipient. It must also be modest enough that it could be made public without embarrassing either FURUKAWA AUTOMOTIVE MEXICO or the recipient. Gifts and entertainment must be accurately recorded in FURUKAWA AUTOMOTIVE MEXICO financial records.

COMMUNITY RESPONSIBILITY

FURUKAWA AUTOMOTIVE MEXICO wants to be viewed as a good corporate citizen. Good citizenship starts with obeying the law, but it goes much further. FURUKAWA AUTOMOTIVE MEXICO provides good jobs and quality products. We support a diverse community and charitable organizations. Some FURUKAWA AUTOMOTIVE MEXICO associates may participate in or lead charitable and volunteer activities. Use of FURUKAWA AUTOMOTIVE MEXICO resources to advance charitable goals must be approved by management.

ENVIRONMENTAL PROTECTION

Protecting the environment is an obligation of FURUKAWA AUTOMOTIVE MEXICO's corporate citizenship. It is FURUKAWA AUTOMOTIVE MEXICO policy to comply with all environmental laws, respect our customers and our communities, go beyond legal requirements where appropriate and seek ways to minimize environmental impact.

Each associate has a role in protecting the environment and is expected to perform their job in accordance with the environmental requirements for that job. For example, you are expected to understand and comply with all FURUKAWA AUTOMOTIVE MEXICO procedures relating to the handling, packaging and transporting of hazardous materials. Each associate is also expected to minimize natural resource use, such as energy or water, and waste generation. If you notice any potential environmental hazards, or opportunities to improve FURUKAWA AUTOMOTIVE MEXICO's environmental practices, notify management immediately.

POLITICAL ACTIVITIES

FURUKAWA AUTOMOTIVE MEXICO encourages associates to exercise their right to vote and participate in the political process. If you are involved in politics, please be sure that you express your views as an

individual, not as a representative of FURUKAWA AUTOMOTIVE MEXICO. Any political activities or donations must be on your own time and at your own expense.

Like all responsible citizens, FURUKAWA AUTOMOTIVE MEXICO may participate in the political process. However corporate political participation is highly regulated. For example, FURUKAWA AUTOMOTIVE MEXICO may not provide donations or any other "in-kind" support to candidates for federal, state or local government offices. If you have contacts with government officials, please make sure you consult with FURUKAWA AUTOMOTIVE MEXICO Ethics and Compliance Officer for guidance in this area.

CONFIDENTIAL INFORMATION

FURUKAWA AUTOMOTIVE MEXICO's continued success depends on developing knowledge and using it to improve the business. Any knowledge that is known only to FURUKAWA AUTOMOTIVE MEXICO, gives FURUKAWA AUTOMOTIVE MEXICO a competitive advantage, or has been entrusted to FURUKAWA AUTOMOTIVE MEXICO by a business partner is confidential information that must be protected. Examples include research and development plans or ideas, design drawings or specifications, manufacturing methods, financial data, pricing, computer program and any other sensitive information.

You have an obligation to safeguard confidential information by:

- Keeping it secure, locking cabinets and desks as appropriate, and protecting sensitive documents with passwords;
- Discussing it only with other FURUKAWA AUTOMOTIVE MEXICO associates who have a need to know in order to do their job;
- Not discussing it in public;
- Disclosing it outside FURUKAWA AUTOMOTIVE MEXICO only if you have the required permission to do so and the party receiving the information has signed a FURUKAWA AUTOMOTIVE MEXICO confidentiality agreement;
- Consulting with management if you know of any developments that may be eligible for protection by patent, copyright or trademark; and or
- Complying with FURUKAWA AUTOMOTIVE MEXICO policies and procedures regarding confidential information.

When your FURUKAWA AUTOMOTIVE MEXICO employment ends, your obligation to protect FURUKAWA AUTOMOTIVE MEXICO's confidential information continues and all FURUKAWA AUTOMOTIVE MEXICO property and documents held by you must be returned to FURUKAWA AUTOMOTIVE MEXICO.

INSIDER TRADING

The law prohibits buying or selling a company's stock when you know material, non-public information about that company. Material information is that which could influence a reasonable investor to buy or sell stock.

Associates aware of material, non-public information relating to FURUKAWA AUTOMOTIVE MEXICO or companies with whom FURUKAWA AUTOMOTIVE MEXICO does business may not directly or through friends or family:

- Buy or sell stock until that information is made public by the company; and/or
- Pass information on to others, including other FURUKAWA AUTOMOTIVE MEXICO associates.

INFORMATION ASSETS OF OTHER COMPANIES

FURUKAWA AUTOMOTIVE MEXICO never uses illegal or unethical methods to gather information about other companies. We respect their proprietary rights, including their patents, copyrights and trademarks. Stealing another company's confidential information, or possessing or using it without their consent, is prohibited. Persuading past or present employees of other companies to disclose their company's secrets also is prohibited. If you receive Information that may be another company's confidential information, or if you have questions about the legality of how you are gathering information, consult the FURUKAWA AUTOMOTIVE MEXICO Ethics and Compliance Officer.

BUSINESS RECORDS AND COMMUNICATIONS

All records, reports and documents must be complete and accurate. Never make false or misleading entries, statements or alterations in any record, whether it relates to financial data; business data such as safety, quality and personnel files; or any other kind of information. Always follow our internal controls and record retention policy.

FURUKAWA AUTOMOTIVE MEXICO submissions to government entities are complete, clear and accurate, and are never misleading. FURUKAWA AUTOMOTIVE MEXICO does not attempt to hide expenditures, and does not establish any undisclosed or unrecorded funds, assets or liabilities.

Business records and communications may become known to the public through litigation, government investigations and the media. Accordingly, in your written and oral business communication, it's important to tell the truth, and to avoid exaggeration, inappropriate language, and derogatory remarks or characterization. This applies to communications of all kinds, including e-mail, voice mail, daily planner notes, and other "informal" notes or memos.

Records of all kinds, including electronic records, should always be retained and destroyed according to the Record Retention Policy. Some records must be retained beyond the time specified in the Record Retention Policy if they relate to a pending or potential lawsuit or government investigation. If you aren't sure, contact the Ethics and Compliance Officer for guidance. Never store FURUKAWA AUTOMOTIVE MEXICO documents or files at home.

GOVERNMENT REQUESTS AND INVESTIGATIONS

Governmental agencies sometimes request information from FURUKAWA AUTOMOTIVE MEXICO, and it is always possible that such agencies may make detailed inquiries into FURUKAWA AUTOMOTIVE MEXICO affairs. Always be truthful and appropriately responsive to governmental requests for information, including requests made during investigations.

If you receive a non-routine request for FURUKAWA AUTOMOTIVE MEXICO information from a government agency or attorney immediately notify the Ethics and Compliance Officer before responding. This helps to ensure that FURUKAWA AUTOMOTIVE MEXICO's response is appropriate both for the company and under the law. If you are in doubt whether the request is routine, contact the Ethics and Compliance Officer.

Never alter, conceal or destroy documents or records if they have been requested by a government agency, or if they are likely to be requested in connection with an investigation. And, of course, never lie or mislead any government representative and don't try to influence others to lie or mislead.

LITIGATION AND CLAIMS

Like all business, FURUKAWA AUTOMOTIVE MEXICO is sometimes involved in disputes that may result in claims or litigation. If you receive a legal document related to FURUKAWA AUTOMOTIVE MEXICO, such as a summons, complaint, subpoena or discovery request, you must immediately contact the Ethics and Compliance Officer to ensure an appropriate and timely legal response. Don't respond to any request, answer questions or produce documents without first discussing the situation with the Ethics and Compliance Officer.

Under no circumstances should you ever threaten or initiate legal action on behalf of FURUKAWA AUTOMOTIVE MEXICO without the prior advice of a FURUKAWA AUTOMOTIVE MEXICO Legal Representative and approval of Senior Management.

MEDIA REQUESTS

FURUKAWA AUTOMOTIVE MEXICO values it's relationships with the media. We attempt to promptly disclose major developments and events in a timely fashion. To ensure professional and consistent handling, all inquiries from the media need to be promptly referred to Human Resources and/or the Ethics and Compliance Officer.

COMPLIANCE WITH ALL LAWS

FURUKAWA AUTOMOTIVE MEXICO follows all applicable laws and regulations. No excuse or pressure can justify breaking the law nor may a consultant or contractor be used to do something prohibited by law or FURUKAWA AUTOMOTIVE MEXICO policy.

This booklet references many laws as well as many FURUKAWA AUTOMOTIVE MEXICO standards that go beyond legal minimums. This is obviously not an exhaustive list. Below are several laws not described elsewhere in this booklet that you should be aware of. Contact the Ethics and Compliance Officer if you find yourself in a situation where you are unsure of your responsibilities under the law.

ANTITRUST

Furukawa Electric, including FURUKAWA AUTOMOTIVE MEXICO supports free and open competition, as well as the antitrust laws intended to promote competition. Antitrust laws prohibit, among other things, agreeing with competitors to limit production, fix prices or divide markets, customers or territories. They also may govern exclusive purchasing or sales agreements with suppliers and customers. This area of the

law is extremely complex and can vary from state to state and country to country. If you're ever in doubt about whether transaction may violate antitrust laws, consult the Ethics and Compliance Officer.

ANTI-CORRUPTION LAWS

FURUKAWA AUTOMOTIVE MEXICO abides by all laws that prohibit bribes and offers of bribes to government officials. You may not make payments to agents or any other representative of FURUKAWA AUTOMOTIVE MEXICO if you have reason to believe that these payments may result in bribes to government officials.

CUSTOMS AND INTERNATIONAL TRADE

When importing or exporting products, information or technology; FURUKAWA AUTOMOTIVE MEXICO will comply with applicable US and other national laws, regulations and restrictions. This includes compliance with all applicable tax and tariff laws and regulations. FURUKAWA AUTOMOTIVE MEXICO also works in close partnership with the government to combat potential terrorism in importing goods from overseas. If in doubt about the law or FURUKAWA AUTOMOTIVE MEXICO policy, check with the Ethics and Compliance Officer and/or the Customs Department.

FINANCIAL REPORTING COMMITMENT

FURUKAWA AUTOMOTIVE MEXICO is committed to establishing and maintaining effective internal controls over financial reporting with the design and implementation of programs and controls to prevent and detect fraud.

FURUKAWA AUTOMOTIVE MEXICO will always make a fair representation in the financial statements of financial position, results of operations, and cash flow in conformity with accounting principles generally accepted in the United States of America (US GAAP).

FINANCIAL REPORTING

FURUKAWA AUTOMOTIVE MEXICO maintains the highest levels of honesty and integrity regarding financial reporting. All FURUKAWA AUTOMOTIVE MEXICO employees are responsible to ensure that every financial reporting is communicated and reported accurately.

FURUKAWA AUTOMOTIVE MEXICO is committed to reporting accurate financial information on all reports and financial statements including the timing of each entry. It is never acceptable to purposely report financial information in the wrong period considering the timing of the expense or payment.

If you have concerns regarding the accuracy or reporting method of financial information, report your concerns through the Ethics and Compliance Officer or other appropriate channels.

QUESTIONS OR CONCERNS?

FURUKAWA AUTOMOTIVE MEXICO believes that every individual can make a difference. According to the FURUKAWA AUTOMOTIVE MEXICO Philosophy, you are expected to go to the spot; address problems personally, face reality and report information directly to those concerned. This philosophy applies to ethical and legal issues just like all other issues. If you're ever concerned with the ethical or legal

consequences of an action, address it professionally by using your own good judgment, this Policy, other FURUKAWA AUTOMOTIVE MEXICO policies and the advice of appropriate FURUKAWA AUTOMOTIVE MEXICO associates.

If the right course of action is unclear, or if you have observed an unethical or illegal act, you are obligated to talk to your supervisor, other appropriate FURUKAWA AUTOMOTIVE MEXICO management or the FURUKAWA AUTOMOTIVE MEXICO Ethics and Compliance Officer. Retaliation against an associate who reports a concern will not be tolerated. Keep in mind that making a report that you know is false is also a violation of the Policy.

FURUKAWA AUTOMOTIVE MEXICO ETHICS & COMPLIANCE CONTACTS

If you have a concern or see a possible violation, the first place to turn is your supervisor. If you are uncomfortable reporting your concern to your supervisor, report it the Ethics and Compliance officer. If you feel uncomfortable with the before mentioned contacts, seek out a trusted member of Senior Management to share your concern. If you would like your report to remain anonymous, make this fact know when sharing your concern or observation. In order to completely investigate your concern, the Ethics and Compliance Officer must have as much information as possible.

Confidentiality for those who report concerns will fully be maintained possible. All reports will be taken seriously.

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