



A Furukawa Company

Your Optical Fiber Solutions Partner®

## **OFS CORPORATE SOCIAL RESPONSIBILITY POLICY**

OFS, as a member of the international business community, commits to its customers, the community and its parent company, Furukawa Electric Co., Ltd., to operate in a socially responsible manner.

The objective of OFS' corporate social responsibility policy is to guide the conduct of OFS' business and relationships in the countries in which we operate. The reference point for the policy is the applicable law of those countries, including international law as incorporated by that law.

### ***Scope***

The corporate social responsibility policy applies to all our facilities throughout the world. It applies to all OFS executives, managers and employees and governs our approach to all of our activities.

### ***Standards of business conduct (Code of Conduct)***

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and applicable legal standards including the U.S. antitrust laws and the Foreign Corrupt Practices Act.

### ***Environment, Health and Safety***

We are committed to a program of activities to achieve continuous improvement in health and safety performance.

Our objective is to reduce our impact on the environment, including factors contributing to climate change, and to comply with environmental legislation and regulations in the jurisdictions where OFS companies operate.

The OFS Environmental Health and Safety Policy is located on the OFS website at [www.ofsoptics.com](http://www.ofsoptics.com) under the "About OFS" "Environment and Safety" tab

## ***Employees***

We are guided by our aim to deliver a competitive and fair employment environment and the opportunity to develop and advance personal performance and business opportunity. We encourage employees to treat each other and those with whom they interact with dignity and respect. We seek to create an environment that embraces respect for individuals. We are an equal employment opportunity employer and prohibit discriminatory employment and other practices against employees or applicants for employment on the basis of any status or characteristic protected by law, including his or her race, color, age, religion, sex, sexual orientation, gender identity, national origin or because he or she is an individual with a disability or is a disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran (referred collectively as "protected veterans"). As a federal contractor, OFS also takes affirmative action to employ and to advance in employment all persons regardless of their race, color, age, religion, sex, sexual orientation, gender identity, national origin or status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. Our policy is to comply with (i) all applicable laws which prohibit forced, slave, or child labor or human trafficking, (ii) wages and hours laws and regulations, including in the U.S. the Fair Labor Standards Act and similar state and local legislation, and (iii) applicable laws and regulations regarding employee safety and working conditions. We cultivate an environment where people feel free to speak out, make suggestions and raise concerns. We also respect our employees' right to associate and be represented.

## ***Customers***

Our business and livelihood depend upon our customers. Every employee is responsible for ensuring that any contact with our customers and the public at large reflects professionalism, efficiency and honesty. We constantly strive to provide high quality service and products and good value.

## ***Suppliers***

We make regular efforts to work with our suppliers to help us achieve our policy aspirations in the delivery of our products and services. Through vendor requirements and our quality control procedures, and by encouraging our suppliers to adopt environmentally friendly practices, we seek to supply products to our customers that are environmentally friendly and safe to use.

OFS is also committed to working with its suppliers to see to it that the welfare of workers and labor conditions within our supply chain meet or exceed recognized standards, including prohibitions on slavery and human trafficking. Our Anti-Modern Slavery and Human

Trafficking Policy is located on the OFS website at [www.ofsoptics.com](http://www.ofsoptics.com) under the "About OFS" "Anti Modern Slavery and Human Trafficking Policy" tab.

### ***Community***

We recognize that our business activities have varying direct and indirect impacts on the communities in which we operate. We endeavor to manage these activities in a responsible manner, believing that sound and appropriate performance in this area is linked to business success. We are committed to reviewing and continuously improving our social responsibility program and encourage our suppliers to implement corporate social responsibilities appropriate to their businesses.

### ***Responsibility and Implementation***

The CEO of OFS has final responsibility for this policy. The Senior Vice President of Human Resources, supported by the OFS Executive Team, is responsible for co-coordinating implementation and operation of this policy and reporting on it to the CEO and OFS' Board of Managers. Monitoring and enforcement of this policy is the responsibility of each of the individual facility managers and their environmental/safety, sales and marketing, procurement, financial, and human resources teams. This policy is communicated to OFS personnel by publication on the OFS Intranet website and will be re-issued at least annually.

A handwritten signature in blue ink, appearing to read "Timothy F. Murray". The signature is fluid and cursive, with a large initial "T" and "M".

Timothy F. Murray  
Chief Executive Officer  
April, 2018