



## Slavery and Human Trafficking Statement

America Fujikura Ltd. and its subsidiaries (“AFL”) are committed to treating people with dignity and respect in the workplace and in the communities where we do business, as well as to the respect and protection of human rights. AFL has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that slavery, forced labor, child labor, workplace abuse and human trafficking are not taking place anywhere in the AFL business or in any of its supply chains.

AFL’s parent company, Fujikura Ltd., is a supporter of the United Nations Global Compact (UNGC) which consists of ten principles in the areas of human rights, labor, the environment, and anti-corruption. The compact requires its supporters’ businesses to adopt sustainable and socially responsible policies and practices and implement them as a good citizen of the world.

AFL is also committed to ensuring there is transparency in our own business and in our approach to identifying modern slavery through our supply chains, consistent with our disclosure obligations under various forced labor regulations in the jurisdictions where we operate. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

### **Activities in FY2023 related to prevention of modern slavery**

**AFL’s Business and Structure:** AFL manufactures, engineers and installs fiber optic products and equipment that helps provide high-speed voice, video and data services to customers in a wide variety of industries providing literally thousands of products and services that are in use around the world. AFL has operations in the United States, Canada, Europe, Mexico, Asia and the South Pacific. (See AFL website, [www.aflglobal.com](http://www.aflglobal.com))

**Modern Slavery Policy:** AFL adopted its Anti-slavery and Human Trafficking Policy in 2016 and implemented aspects of the policy within our global business units and supply chains.

### **Due Diligence**

- 1. Supplier Qualifications:** AFL utilizes a hybrid centralized/decentralized supply chain model. Each business unit qualifies its own vendors and materials suppliers and conducts certification processes. Our manufacturing business units have prequalification processes in place for new suppliers and vendors which form part of their Quality and EHS Management Systems. This may include regular re-qualification and auditing of existing suppliers, based on risk assessment processes. AFL uses a supplier self-assessment questionnaire addressing modern slavery in the qualification process and will continue to implement this system with new and existing suppliers. This process requires our supply chain suppliers to certify to the best of their knowledge, that the materials they supply or incorporate into products are generated in compliance with applicable anti-slavery and human trafficking laws. Additionally, AFL has established a Supplier Code of Conduct (SCOC) to demonstrate expectations for ethical behavior across our supply chain. Suppliers are expected, in all their activities, to maintain high ethical standards, act with integrity, and operate in full compliance with applicable laws, rules and regulations of the countries in which they operate.

2. **Verification of Supply Chains:** AFL is committed to fair labor practices within our supply chains. Where allowed, AFL has added or expanded the “Right to Audit” clause in our new and renewal supplier contracts. AFL may periodically audit product supply chains to specifically evaluate and address risks of human trafficking and slavery, with priority given to high-risk locations. Should modern slavery concerns be exposed during audit, AFL is committed to working with suppliers towards improvement and to make a positive difference to the workers.

**Training:** AFL requires all new associates to review and acknowledge the Modern Slavery Policy as part of the associate orientation process. AFL presents the policy for review to all existing employees with email access by way of our online compliance training portal. AFL provides procurement and supply chain associates with training on modern slavery and human trafficking annually, particularly with respect to identifying and mitigating risks within the supply chain.

**Reporting:** AFL provides its global employees with an avenue to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain by directly reporting to management, or by anonymous reporting by phone or internet through our Ethics & Compliance Portal. Outside of our business, third parties wishing to raise concerns may contact the AFL Legal and Compliance department by calling (864) 433-0333.

This statement is made pursuant to the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, the California Transparency in Supply Chains Act and the Canada Forced and Child Labour in Supply Chains Act and constitutes AFL’s Slavery and Human Trafficking Statement for the fiscal year which ended March 31, 2024.

A handwritten signature in black ink, appearing to read 'J. Lang', with a stylized flourish at the end.

Jaxon Lang  
President and Chief Executive Officer  
AFL  
May 2024