



SUPPLIER CODE OF BUSINESS CONDUCT

Doing Right, The Right Way



DOING RIGHT
ETHICS & COMPLIANCE

THE RIGHT WAY

Worldwide Edition: Effective October 1, 2021



At Southwire, we are deeply committed to conducting business with the utmost integrity and ethics and to complying with applicable laws worldwide. This Southwire Supplier Code of Business Conduct sets forth our standards and expectations for our Suppliers. Our goal is to ensure that all levels of our business, including our Suppliers, share our commitment to driving success through ethical decision-making, compliance, and integrity. The Supplier Code of Business Conduct applies to all companies or individuals providing goods and/or services (“**Suppliers**” or “**You**”) to Southwire Company, LLC and its subsidiaries and other affiliates, wherever located worldwide (collective and individually, “**Southwire**” or “**We**”).

1. COMPLIANCE WITH LAWS

Suppliers must maintain full compliance with all laws, regulations, and rules applicable to the operation of business and their relationship with Southwire. This includes, but it is not limited to, all applicable laws, regulations, and rules in countries and localities where business is conducted pertaining to anti-bribery and anti-corruption, labor, anti-discrimination and anti-harassment, health and safety, conflicts of interest, conflict minerals, information protection, non-retaliation, the environment, trade, and fair competition.

2. ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers must not engage in any conduct that would violate the U.S. Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Public Officials Act, and other local, national, and international antibribery laws and treaties applicable to Southwire’s business. Suppliers must never authorize, promise, offer, or give a bribe or anything of value, to a government official or any other person, directly or indirectly, in order to obtain or retain business or secure an improper advantage. Suppliers are required to promptly report any solicitation for a bribe from a government official in connection with Southwire’s business to Southwire’s Ethics and Compliance Office.

Additionally, Suppliers must not request or solicit a bribe, kickback, gratuity, or anything of value, directly or indirectly, from any person on Southwire’s behalf or in relation to Southwire’s business. This prohibition includes “facilitation” or “greasing” payments, even if permitted under applicable law.

To ensure that Suppliers do not engage in paying bribes or kickbacks in performing their duties for Southwire, Suppliers should adhere to the following: (a) conduct reasonable, risk-based due diligence on their business associates and other third parties, (b) engage business associates using written contracts that include appropriate anti-bribery protections, and (c) pay only market-based (reasonable) commissions. An unethical representative can damage Supplier’s and Southwire’s reputations and expose Supplier, Southwire, and our respective representatives to criminal liability, resulting in severe fines, penalties, and other sanctions. Additionally, as it relates to Southwire’s business, Suppliers must maintain accurate books and records because inaccurate or false books and records and inadequate financial controls, offer a fertile environment for financial fraud, bribery, theft, and embezzlement.



3. ACCEPTANCE OF GIFTS AND BENEFITS

Suppliers must comply with Southwire's gifts and entertainment policies. Southwire prohibits giving or accepting gifts or entertainment exceeding nominal value to or from any of its Suppliers. This applies to Southwire employees, agents, contractors, and each of their immediate family members.

The following types of gifts and entertainment may never be offered to or accepted by Supplier with respect to Southwire's business, regardless of value: cash or cash equivalents (i.e., gift cards); gifts that are or could be illegal; any gifts or entertainment (including meals, transportation, and travel accommodations) offered in connection with an inspection or audit during a bidding process involving the Supplier; or to a Southwire agent or consultant working on behalf of Southwire. Suppliers should report any requests for expensive gifts or entertainment by Southwire employees to Southwire's Ethics and Compliance Office. This prohibition does not change during traditional holiday gift-giving seasons.

4. LABOR

Southwire expects its Suppliers to share in its commitment to equal employment opportunity and treat all individuals with respect. Suppliers must comply with the applicable labor laws and regulations of the countries and locations in which they operate and ensure fair and lawful labor conditions. This applies to all workers, including temporary, migrant, student and contract workers.

With respect to Southwire's business:

- ***Non-Discrimination, Harassment and Abuse.*** Suppliers should make hiring decisions on the basis of the employee's qualifications to perform the specific job. Supplier should not make any decisions relating to hiring, salary, benefits, advancement, discipline or termination on the basis of the employee or potential employee's race, color, religion, creed, national origin, ancestry, ethnicity, sex (including pregnancy), sexual orientation, gender identity, age, disability, citizenship, genetic information, marital status, military or veteran status or affiliation, or any other characteristic protected by applicable law.
- ***Freely Chosen Employment.*** Suppliers must comply with Southwire's human rights and prevention of human trafficking policies. You must not use forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, or slave labor. You also must not engage in trafficking of persons, including transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. You must not place unreasonable restrictions on your workers' freedom of movement in your facilities or ability to voluntarily resign their employment in accordance with local or national laws or regulations. You should investigate and not ignore "red flags" or circumstances that suggest that any of your workers or contractors may possibly be trafficked or forced to provide labor or services. You and your agents may not hold or otherwise destroy, conceal, confiscate or deny access by your workers to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.



- **Child Labor.** You must comply with all local and national laws on minimum working age, and not use child labor. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is permitted. You must not permit workers under the age of 18 to perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- **Working Hours.** Working hours, including overtime, must not exceed the maximum set by local or national law or regulations.
- **Wages and Benefits.** You must comply with all applicable local and national wage laws and regulations, including those related to minimum wages, overtime hours, statements of wages, permissible deductions from wages, and legally mandated benefits. Any use of temporary, dispatch, and outsourced labor also must comply with all local and national laws and regulations.
- **Humane Treatment.** You must not subject or threaten to subject your workers or any workers under your supervision to harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse. You must clearly define and communicate to your workers disciplinary policies and procedures in support of these requirements.
- **Freedom of Association.** Southwire is committed to freedom of association. Therefore, we strongly recommend that our Supplier, in conformance with local and national laws and regulations, respect all workers’ freedom of association, including the ability to form and join trade unions of their own choosing, bargain collectively, and engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. We recommend that you permit workers and/or their representatives to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

5. HEALTH AND SAFETY

At Southwire, we put safety first in all we do. Our goal is a zero injury and illness safety culture where workers demonstrate personal commitment to continuous safety improvement and to the safety of the communities we serve. Protecting workers and the community enhances the quality of life for our workforce and contributes to our long-term business success. Actions taken to suppress reports will not be tolerated. Suppliers are held accountable and must demonstrate their commitment to providing a safe and healthy workplace by exercising good judgment and applying safe work practices to all activities, including regulatory and contract-specific requirements. Among other requirements, while working on Southwire business, Suppliers must ensure their workers adhere to general and site-specific safety requirements and restrictions, including the use of personal protective equipment (PPE), prohibitions on the use and possession of illegal drugs and alcohol, restrictions on the possession of weapons, and support for a violence-free environment.



6. CONFLICTS OF INTEREST

Southwire has a strict conflicts of interest disclosure policy for employees. Likewise, we expect our Suppliers to disclose conflicts and potential conflicts. If a Supplier's employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, in-law, or same or opposite sex domestic partner) to an employee of Southwire, or if a Supplier has any other relationship with an employee of Southwire that might represent a conflict of interest, the Supplier should disclose this fact to Southwire or ensure that the Southwire employee does so. Suppliers and Southwire employees are required to disclose to Southwire's Ethics and Compliance Office a relationship that creates or has the potential to create an actual or perceived conflict of interest in advance or immediately upon discovery so that such relationship may be reviewed and appropriately addressed.

7. CONFLICT MINERALS

To ensure full compliance with Section 1502 of the Dodd-Frank Act relating to trade in conflict minerals, Southwire is committed to responsible sourcing practices, including practices involving the procurement and use of precious metals (such as tin, tungsten, tantalum, and gold) from the Democratic Republic of Congo (the "DRC") and its adjoining countries. It is our environmental and social responsibility to source from and adhere to responsible mining practices and have the highest commitment to human rights. Southwire will reinforce our commitment to conflict-free trade through the establishment of company management systems and supply-chain due diligence. In turn, Suppliers are expected to ensure that products supplied to Southwire are DRC conflict-free and are expected to cooperate with our due diligence process.

Affected Suppliers are encouraged to establish policies, due diligence frameworks and management systems consistent with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

If our Suppliers do not cooperate with our requirement to source conflict-free products or our requests for information concerning their sourcing activities, Southwire may demand corrective action or terminate its business relationship with the Supplier.

8. INFORMATION PROTECTION

Suppliers must respect Southwire's legitimate proprietary rights and intellectual property rights, including patents, trademarks and copyrights. Suppliers must take care to properly protect sensitive information, including confidential, proprietary and personal information and avoid using any such information for any purpose other than the business purpose for which it was provided, unless Southwire provides prior written authorization. All personal data of Suppliers' and Southwire's employees, consumers, and other parties must be treated in accordance with applicable data protection and privacy laws and any other applicable laws, rules or regulations.



9. NON-RETALIATION PROTECTIONS

Suppliers are expected to implement effective processes to ensure the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical, policy or legal violations involving Southwire's business. With respect to reports relating to Southwire business, Suppliers must not tolerate any retaliation, retribution, bullying, harassment, demotion or other direct or indirect reprisals against any person who (a) reports, in good faith, a concern or suspected violation of a policy, law or ethical standard, or (b) is assisting in an investigation or process involving a suspected violation.

10. ENVIRONMENT

With respect to Southwire's business, affected Suppliers must comply with all national and local environmental laws applicable to air emissions, waste handling and disposal, water use, wastewater discharges, and hazardous and toxic substances. Suppliers shall validate and maintain records demonstrating that source materials with respect to Southwire's business were harvested in accordance with our contract, national, and local laws.

Suppliers are encouraged to manage compliance, minimize environmental impact, and drive continual improvement through implementation of programs comparable to ISO 14001 or similar programs that drive a comprehensive approach to environmental matters. In that vein, Suppliers providing products or services that may have an environmental impact are subject to the following requirements and recommendations:

- Suppliers should have procedures for notifying local authorities in case of an accidental discharge or release of hazardous materials into the environment, or in the case of any other environmental emergency.
- Suppliers should store hazardous and combustible material in secure and ventilated areas and dispose of them in a safe and legal manner.
- Suppliers are encouraged to develop robust means by which they monitor, measure, and validate their use of materials and resources, discharges, and emissions to understand and reduce their impact on the environment. Specifically, Suppliers should focus on:
 1. Greenhouse gasses and other emissions to the air.
 2. Ozone-depleting compounds in a manner that meets standards such as the Montreal Protocols.
 3. Water resources including a mitigation strategy to address water risk in their facilities and through their supply chain.
 4. Waste, re-use, and recycling, where disposal is the least desired outcome, but when necessary, is conducted in a manner with the least negative impact on the environment.



- With respect to Southwire business, Suppliers must maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- With respect to Southwire business, Suppliers must comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content, or handling of specific substances, including but not limited to, RoHS, WEEE, REACH, California Prop. 65, and other similar laws. Suppliers must provide Southwire any information demonstrating compliance with such laws as they relate to Southwire's business with Supplier. This may include, but is not limited to, full material declarations, as applicable.

11. TRADE LAWS

Southwire is fully committed to ensuring we do our part to protect United States national security and promote U.S. foreign policy. If a Supplier relationship involves international trade of Southwire-related products or services, we expect our Suppliers to be knowledgeable of and abide by all applicable laws.

With respect to Southwire business, Suppliers must cooperate with all U.S. Treasury Department's Office of Foreign Assets Control economic and trade sanctions prohibiting business with certain countries, agencies and individuals, and conduct appropriate screenings to ensure that they are engaged with permissible parties.

Also with respect to Southwire business, all export control restrictions established to prevent sensitive goods, technology and software from falling into the wrong hands must be obeyed and appropriate screenings conducted to ensure that Suppliers are dealing with lawful parties. In addition, with respect to Southwire business, our Suppliers are prohibited from participating in or supporting economic boycotts not sanctioned by the U.S. government.

12. FAIR COMPETITION

At Southwire, we believe in doing business honestly and transparently. We will always participate in the marketplace fairly and in compliance with anti-trust laws and regulations. With respect to Southwire business, we expect our Suppliers to refrain from activities that reduce competition and restrict trade such as agreeing to fix prices, rigging bids, or dividing market territories. Our Suppliers are expected to conduct business with integrity and should refrain from any activity that disrespects our competitors.

13. GUIDANCE AND REPORTING

Suppliers should contact Southwire's Ethics and Compliance Office with any information that you believe may relate to a suspected violation of this Supplier Code of Conduct or applicable legal, contractual, policy, or ethical requirements, or with any questions about this Supplier Code of Conduct.



Reports of suspected violations must be made immediately to Southwire’s Ethics and Compliance Office as follows:

In-Person Ethics and Compliance Office
Southwire Company, LLC
One Southwire Drive
Carrollton, Georgia USA 30118

Phone +1 (770) 832-4201

Email doing.right@southwire.com

You also may ask questions or report any actual or potential violation of this Supplier Code of Conduct through Southwire’s Doing Right Helpline. The Doing Right Helpline is run by an independent third-party and is available 24/7, 365 days a year. Reports to the Doing Right Helpline may be made anonymously if desired. There are three ways to submit a report through the Doing Right Helpline:

Website www.doingrightconnection.com

Phone..... You may call the Helpline free of charge. The number in the United States is +1 (800)504-9514. Phone numbers outside of the United States and further instructions are available at www.doingrightconnection.com.

Text Message +1 (678)780-4262

Once reported, Southwire will assess the information and determine whether further investigation of the report is required and what additional actions are appropriate.

14. DISCIPLINE AND PENALTIES

Suppliers who do not comply with the requirements of this Supplier Code of Conduct may be subject to severe consequences, which may include termination of any applicable contracts and their business relationship with Southwire and referral to enforcement authorities for corporate and individual prosecution leading to criminal fines and penalties, which may lead to imprisonment for individuals.

15. COOPERATION WITH INVESTIGATIONS AND DISCLOSURE TO REGULATORY AGENCIES

At Southwire’s request, Suppliers must cooperate in any investigation of suspected wrongdoing under this Supplier Code of Conduct. Suppliers must take appropriate remedial and corrective measures with respect to this Supplier Code of Conduct and their policies, procedures, and compliance programs. Additionally, Suppliers must notify Southwire of disclosures to regulatory agencies or authorities relating to Southwire’s business when such disclosures are made.