

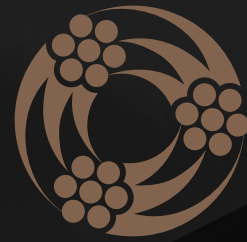


**STRONG.
SUSTAINABLE.
SOUTHWIRE.**



2021 SUSTAINABILITY REPORT





Southwire®

WE DELIVER POWER... RESPONSIBLY

At Southwire, we remain committed to the sustainability of our company for the next 100 years and beyond. As we strengthen this commitment, we continue to work hard every day to discover, develop and distribute sustainable solutions that exceed the expectations of our stakeholders around the world.

Building upon this spirit, we are pleased to present our 2021 Sustainability Report. As seen in past reports, this assessment covers sustainability at Southwire, highlights our most significant impacts and opportunities and details our sustainability goals and strategies.



As a signatory to the United Nations Global Compact (UNGC), Southwire is pleased to reaffirm our continuing support and commitment to its Ten Principles and their integration into our business.

COVID-19 RESPONSE

In 2021, we continued to keep employee safety at the forefront as the COVID-19 pandemic remained a challenge. By uniting as ONE Southwire, we maintained consistent pandemic protocols as we worked to best serve our customers.

As we saw fluctuating case counts and spikes during the Delta and Omicron surges, our focus remained on our employees, our customers and our communities. Our COVID-19 committee worked diligently to stay on top of and respond to changing COVID conditions. This included keeping our employees informed as the COVID-19 vaccine was introduced, providing accessibility to vaccines and testing and maintaining timely, ongoing communications. We also increased our efforts surrounding mental health by creating awareness and dialogue opportunities on a regular basis.

For our communities, Southwire's efforts toward Giving Back did not waver through the pandemic. Through our company's giving and our volunteers' efforts to find ways to serve virtually, we were able to continue making an impact in the places we call home. We continue to be proud of the work of our teams and the efforts of our employees around the company as we have navigated the pandemic.

SAFETY

The safety of Southwire's employees remains our top priority. We will continue to keep the well-being of our people at the forefront, and we aim to increase our safety performance in 2022.

Additionally, we're also maintaining a strong focus on quality and continue to promote and ensure best practices in the realm of cybersecurity. We continue to complete cybersecurity testing and encourage our employees to be cautious, assertive and protective with technology. To ensure that our leaders stay educated and up to date, we offer trainings provided by in-house and external legal counsel, banking and consulting advisors.

STRATEGY

As we strive to become a sustainable, diversified electrical company, we continue to refine and execute our strategic plan. We continue to Unite as ONE Southwire, focusing on three strategic objectives to Build Organizational Capability, Drive Operational Excellence and Accelerate Growth – with the aim of advancing our overarching purpose of building a sustainable, multi-generational business that reflects the core values of the shareholders for the next 100 years and beyond.

We will also continue to assess transformational trends and influences that may impact our future as we implement initiatives to strengthen and grow our core wire and cable business and explore opportunities to diversify. We believe that our strong brand, market position and financial strength uniquely position us to achieve these objectives.

SYSTEMS & OPERATIONAL EXCELLENCE

In order to Drive Operational Excellence across the company, Southwire continues refining systems and processes in support of ONE Southwire. Additionally, we continue advancing our multi-year commitment to modernization across the company.

INCLUSIVITY & EMPLOYEE ENGAGEMENT

We continue to work toward building a company culture that is based on empowerment, trust, consistency and inclusion through companywide diversity and inclusion initiatives. Southwire has six active Employee Resource Groups (ERGs) that provide opportunities for learning, connection and development across the company. These ERGs include the Women's Network, Spectrum, NEXTgen, TEAM, Officium and Allied and actively promote the company's commitment to inclusivity by engaging group members and encouraging participation in events throughout the year.

Southwire continued its resolution to invest in diversity, equity and inclusion (DEI) efforts by contributing more than \$325,000 to inclusive organizations such as Wounded Warrior Project®, The Arc, NAACP, Chris 180, Catalyst, Inclusion Matters, Women in Manufacturing, the Affordable Housing Project and many others in 2021. In addition, the company also committed \$50,000 in scholarship funds to Historically

Black Colleges and Universities (HBCUs). Southwire was again recognized this year as one of the Top Diversity Employers by DiversityJobs.com and has fostered partnerships with 24 different inclusive organizations. Employee engagement remains important to us, and we measure engagement through a platform that allows our leaders to receive real-time data and insights on team results. We are proud to see new growth in a wide range of efforts devoted to DEI, and we are committed to continue making improvements where needed.

COMMUNITY

We remain inspired and encouraged by the generosity of our people and Project GIFT® teams and are proud of our commitment to Giving Back in the places we work, live and serve. Following the devastating winter storm that struck Texas in March, our Project GIFT® team worked alongside locally based Southwire customers, as well as disaster-relief response efforts to provide water, food and electricity to those affected. Please see our [webpage](#) for more information on community activities related to Giving Back.

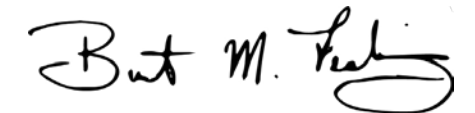
Southwire remains at the forefront of private companies who are deeply committed to the environment, social welfare and governance. The company was recognized for the second consecutive year in 2021 by Deloitte and The Wall Street Journal as part of the US Best Managed Companies program.

We have much to be proud of as we look back at how we navigated the challenges of 2021. Through the continued pursuit of our sustainability goals, we are confident that Southwire will continue to meet, and even exceed, the goals that we have set for our future. We are incredibly proud to be associated with this great organization and are thankful for The People Behind the Power™ who work hard to ensure that we will remain an industry and community leader for years to come.

Sincerely,

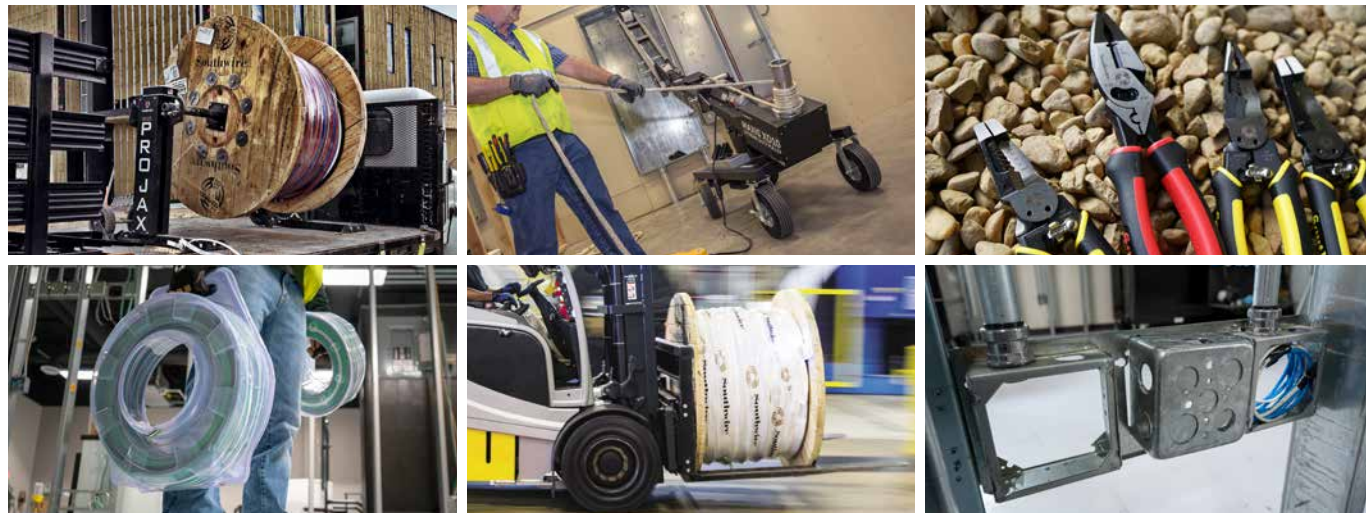


Rich Stinson
President and CEO



Burt M. Fealing
EVP, General Counsel and
Chief Sustainability Officer

ABOUT SOUTHWIRE



Southwire Company, LLC and its subsidiaries and affiliates (“Southwire”) is a family-owned leader in technology and innovation with over 70 years of experience. We operate one of the largest privately held manufacturing and service companies in North America.

A leader in technology and innovation, Southwire is one of North America’s largest wire and cable producers and an emerging influence in the industrial electrical space. Southwire and its subsidiaries manufacture building wire and cable, utility products, metal-clad cable, portable and electronic cord products, OEM wire products and engineered products. In addition, Southwire supplies assembled products, contractor equipment and hand tools. To our knowledge, none of our items or services have been specifically prohibited in any country.

We are made up of five distinct business units: Commercial Wire & Cable; Operations; Tools, Components & Assembled Solutions (TCAS); Metals; and Service & Solutions. With this alignment, Southwire can focus on its major growth strategies and operational initiatives such as systems improvement and modernization. The company offers an array of products and service brands, including SIMpull Solutions®, Garvin®, TAPPAN™ and SCR®, for a variety of industries including automotive, telecommunications, transit, renewable energy, electric utilities, mining, construction, and more. As a result, our products help provide safe and reliable energy to millions of individuals and businesses around the world.

SOUTHWIRE AT A GLANCE

FOUNDED

1950

HEADQUARTERS

CARROLLTON,
GEORGIA

EMPLOYEES

7,500

NET SALES

\$8B

LOCATIONS

Offices and Operations: in more than 40 cities in the United States, Mexico, Canada, Honduras, China and the Netherlands

Manufacturing & Assembly: 27 manufacturing and assembly plants in the United States, Mexico, Honduras and China

BRANDS AND PRODUCTS

We produce nearly half of the cable powering the US, and we provide wire to nearly one in two new houses constructed in the United States. Our continuous casting systems are also responsible for producing over half of the world’s copper rod used to produce other goods, such as automobile wiring harnesses and electric motors. Our brands, products and services include wire and cable products, supply tools and equipment, cord sets, other assembled products and services, including:

ROMEX®
SIGNAL®
SIMPull THHN®
SIMPull® CoilPAK™

Tappan™
Royal®
MCAP®
SIMPull™ REEL

SCR®
Polar Solar®
Maxis®
SIMPull Solutions®

VALUES AND CULTURE

VISION:

At Southwire, our employees are The People Behind the Power™ of what is possible. We seek to discover, develop and distribute strong and sustainable solutions that exceed the expectations of our stakeholders around the world.

COMMITMENT:

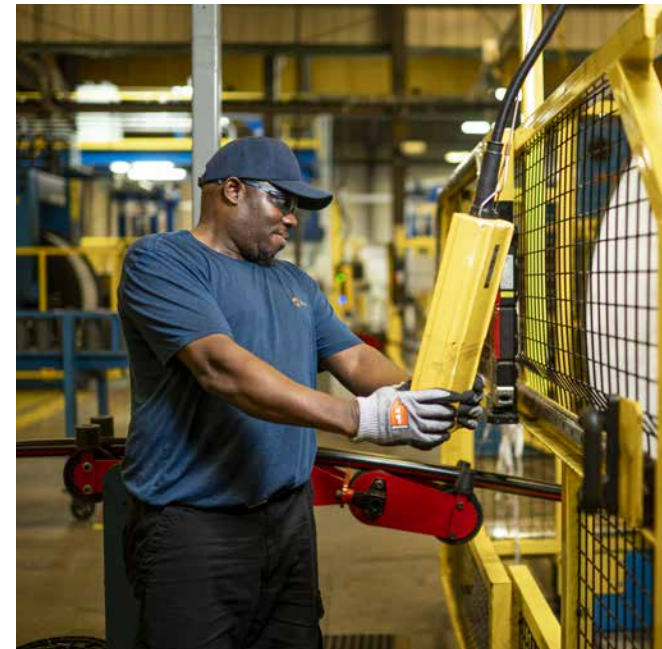
Southwire is committed to developing innovative systems and solutions, exercising environmental stewardship and enhancing the well-being of our communities through our core tenets: Growing Green, Living Well, Giving Back, Doing Right and Building Worth. As our slogan suggests, We Deliver Power...Responsibly®.

GROWING GREEN | LIVING WELL
GIVING BACK | DOING RIGHT | BUILDING WORTH

VALUES:

Our “ONE Southwire” culture is built on a foundation of empowerment, trust, consistency and inclusion. These values allow us to achieve our goals and build a thriving, multi-generational company.

At Southwire, our people and culture are paramount to manufacturing and delivering the high-quality products and services our global markets and stakeholders expect. Whether through business operations or social engagements, our five core tenets ground our dedicated employees, and we are committed to making a positive impact on the world and communities in which we live and operate. We also believe that by creating a diverse, inclusive, and health and safety-focused culture, we can empower our employees to achieve their full potential while helping us drive sustainable business growth.



APPROACH TO SUSTAINABILITY



As a family business, we are committed to corporate sustainability. We prioritize environmentally responsible operations by developing innovative manufacturing and installation solutions in response to increasing stakeholder expectations, and we track and monitor our impact on our local environments. In addition, we look for opportunities to foster the health and well-being of our communities through our Strong, Sustainable Southwire strategy. Our Executive Vice President (EVP), General Counsel and Chief Sustainability Officer is responsible for overseeing our sustainability strategy and initiatives.

THE FIVE CORE TENETS

Our strategic sustainability approach leverages our five core tenets to lead and ground our efforts. These tenets are embedded throughout our company culture. They include:

GROWING GREEN

We aim to reduce our environmental footprint, even as we sustain our business and the communities in which we live and work. We recognize that our success depends on the conscientious use of the finite resources of our planet, and we maintain a deep commitment to responsible growth and actively integrating environmental priorities into our core operations.

LIVING WELL

We nurture the culture of a “Southwire family,” and we work each day to enhance the lives of our employees by building a workplace that is diverse, supportive and engaging. Safety and health are top priorities, and we will always treat each other with dignity and respect.

GIVING BACK

Our neighbors depend on us, just as we depend on them. Therefore, we are committed to improving the quality of life in the communities in which we work. At Southwire, this goes beyond providing jobs and paying taxes; it means supporting those in need with time, talent and financial resources.

DOING RIGHT

We foster a culture guided by the ethics of mutual respect, integrity and honesty. We are committed to supporting those values in every aspect of our business and working lives, and we promise transparency and responsiveness when challenges arise.

BUILDING WORTH

Our success depends on our customers’ success. We build worth for our shareholders, customers and other stakeholders by achieving the highest quality and best service in our industry and delivering it with a culture of excellence.

APPROACH TO SUSTAINABILITY

We have identified priority environmental, social and governance (ESG) material topics in four of our five core tenets, reflecting our commitment to these tenets as well as the significant role they play in our strategic sustainability efforts. Priority ESG material topics by tenet include:



- » Energy & GHG Emissions
- » Materials, Recycling & Circular Economy
- » Water & Wastewater



- » Diversity, Equity & Inclusion
- » Employee Engagement & Retention
- » Talent Attraction
- » Workplace Safety & Employee Well-being



- » Community Engagement & Partnerships
- » Philanthropy & Volunteerism



- » Cybersecurity & Data Privacy
- » Ethics, Anti-Corruption & Transparency
- » Sustainable Supply Chain & Procurement Practices



- » Climate Change & Zero Carbon Transition
- » Customer Experience
- » Product Quality & Safety

**Southwire considers Community Engagement & Partnerships and Philanthropy & Volunteerism to be highly significant issues, despite the fact that they are not designated as tier one topics in our materiality analysis.*

APPROACH TO SUSTAINABILITY



United Nations
Global Compact

THE BOARD SUSTAINABILITY COMMITTEE

For more than a decade, the Southwire Board of Directors' Sustainability Committee has provided management guidance and advice through oversight of our Environmental, Social and Governance (ESG) initiatives. The committee also provides sustainability leadership and decision making for:

- Environmental affairs
- Customer and employee safety and health
- Ethics and compliance
- Long-term goal setting
- Resource commitments for sustainability initiatives

THE UNITED NATIONS GLOBAL COMPACT AND THE GLOBAL REPORTING INITIATIVE

Southwire is committed to the United Nations Global Compact (UNGC) principles. The initiative helps us align strategies and drive operational awareness around universal sustainability topics on human rights, labor, environment and anti-corruption. As a signatory, we annually report our progress on 10 UNGC principles and share our vision and progress aligned with our management approaches and progress on material topics in accordance with the Global Reporting Initiative (GRI). To learn more about our commitment to the Global Compact, please see our [UNGC Index](#).

We are proud of Southwire's sustainability progress and look forward to our future. For more information on the Board Sustainability Committee and its associated responsibilities, please see our [Sustainability Committee Charter](#).

SUSTAINABILITY GOALS

Through Southwire’s ongoing commitment to sustainability, we continue to look for opportunities to discover, develop and distribute sustainable solutions that exceed the expectations of our stakeholders around the world.

Like our approach to sustainability, our goals are also aligned with our five core tenets:

Growing Green Goal:

Achieve 100% zero carbon energy (Carbon Zero) for our operations by 2025, compared to our 2018 baseline.

Southwire contracted with Georgia Power and Constellation Energy to provide the environmental attributes (renewable energy credits) associated with new solar installations that will be coming online in 2022-2024. At an operational level, the plants and service centers have identified potential energy efficiency opportunities based on past audits. Locations will implement projects to reduce energy consumption in 2022.

At a more local level, we continue to recognize the need to support alternative energy at our sites. Specifically with regards to electric vehicles, we brought the total number of charging installations up to six in 2021 with the addition of systems at the Southwire Family Medical Center in Carrollton, Georgia and our Heflin, Alabama plant. Additional locations are planned for 2022. In 2021, we also broke ground on our new copper rod manufacturing plant in Carrollton, Georgia, which will be powered by 100 percent renewable electricity.

Greenhouse Gas Emissions	2019	2020	2021
Scope 1	103,370	100,034	106,117
Scope 2	251,397	240,319	197,716
Combined	354,767	340,353	303,833

Living Well Goal:

Achieve a total recordable injury rate (TRIR) of 0.5 by 2023.

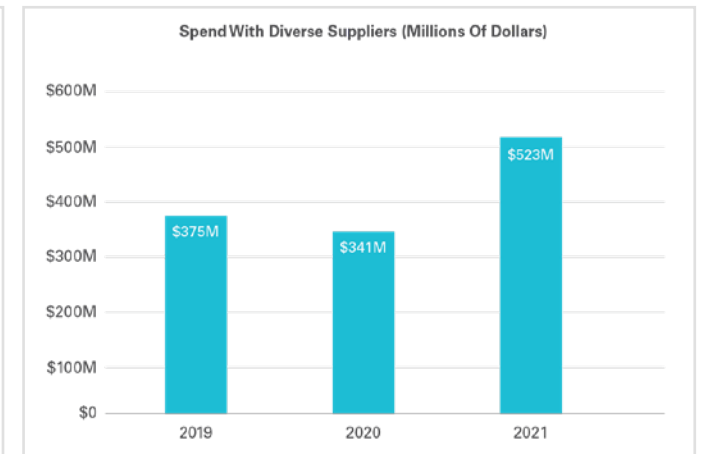
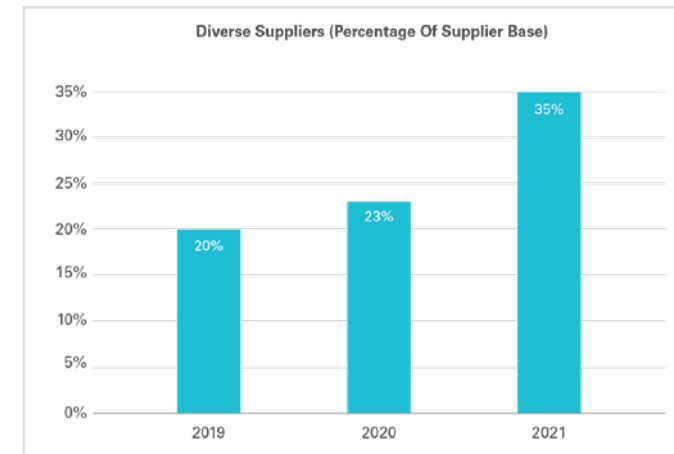
In 2021, Southwire was a finalist of the National Safety Council Robert W. Campbell Award. Although we did not win, simply being considered as a finalist is a testament to Southwire’s leadership and excellence in integrating Environmental, Health & Safety (EHS) management with business operations systems, and it reflects our dedication to our world-class safety culture. In 2022 and beyond, we will continue to focus on our world-class safety goal, which aims for zero injuries and illnesses at all Southwire locations.

OSHA Total Recordable Injury Rate (TRIR) & Lost Work Day Rate (LWDR)- Permanent & Temporary Employees	2019	2020	2021
Employee TRIR	0.87	0.83	0.88
Employee LWDR	0.13	0.23	0.13

Doing Right Goal:

Achieve recognition on Ethisphere’s World’s Most Ethical Companies list by 2025.

In October 2021, Southwire strengthened our Supply Chain performance by publishing a Supplier Code of Business Conduct, which sets forth standards and expectations for all suppliers. We also released our first Ethics and Compliance Program Charter in 2021 and expanded training and education on cybersecurity for our employees. Additionally, we are making progress towards building an ethical, diverse and sustainable supply chain by expanding supplier diversity.

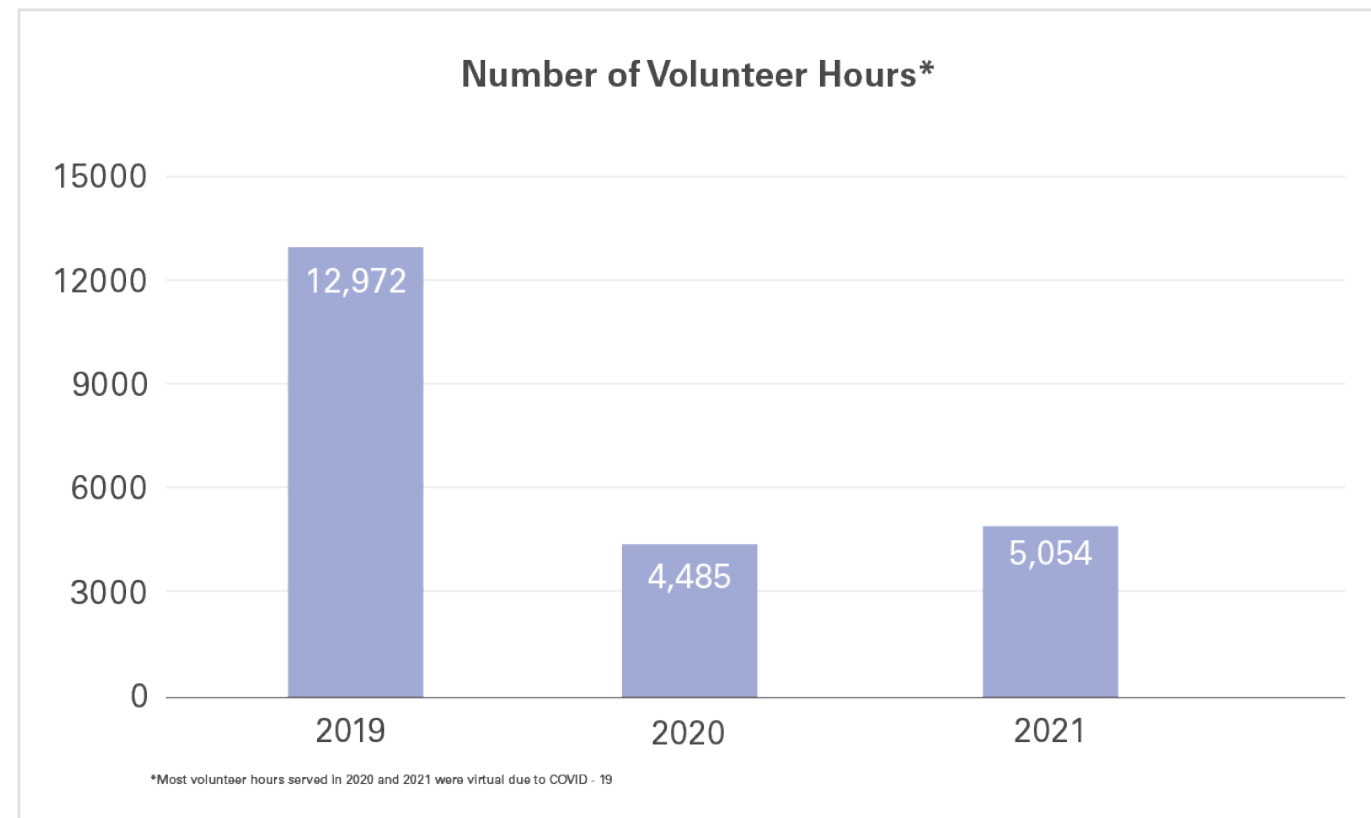


SUSTAINABILITY GOALS

Giving Back Goal:

Enable and engage our workforce in building more sustainable communities. Specifically, our current metric is to launch electronics recycling programs in 100% of the communities in which we operate by 2023.

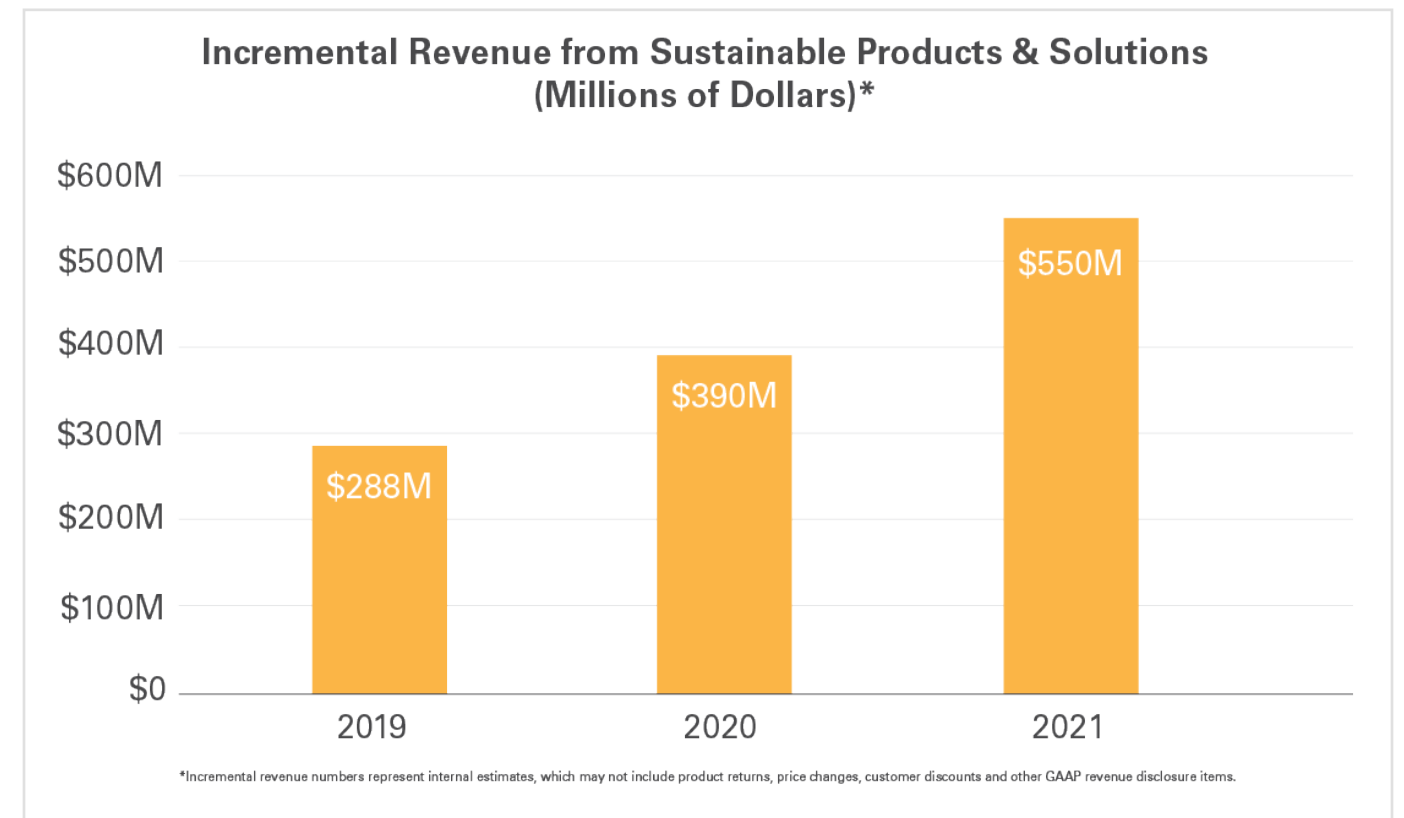
In 2021, we partnered with the software company Blackbaud to help track and manage charitable donations and employee volunteerism more efficiently through the online platform, YourCause. Despite in-person activities being affected by the ongoing pandemic, our employees found creative ways to give back. Their combined volunteer efforts totaled more than 5,000 hours.



Building Worth Goal:

Grow incremental revenue from our portfolio of innovative products, solutions and packaging that drive sustainability to \$1 billion in 2025.

Despite numerous supply chain disruptions due to the ongoing COVID-19 pandemic and global inflation, Southwire continued to make significant progress towards this goal in 2021. We saw increased demand for electrical products related to solar, wind and EV charging infrastructure. As a result, our commercial and R&D teams are prioritizing sustainable products and solutions. Approximately 58% of ongoing R&D projects were related to products with sustainable attributes, and 61% of the team's spend involved products with sustainable attributes.



GROWING GREEN

At Southwire, operating a responsible business includes a dedication to managing and reducing the impact of our business operations on the environment. Greenhouse gas (GHG) emissions, water and resource usage and waste generation are all areas where significant environmental impact reduction opportunities exist. Using both internally-developed and third-party verified environmental management systems (EMS), we require each Southwire site to conduct analyses to identify critical site activities that may adversely affect the environment. We develop and implement management strategies in response to EMS findings, and continuously look for opportunities to track and manage these activities. We also understand that the long-term success of our business depends on our continual management of Earth's finite resources. As a result, we remain steadfast in our dedication to sustainable growth and development.

ENERGY & GHG EMISSIONS

APPROACH

Energy use and GHG emissions are a defining business issue and were identified through our materiality assessment as the most critical environmental topics for Southwire manufacturing operations, corporate offices, suppliers and customers. As a result, we prioritize efforts to help reduce GHG emissions across our value chain.

We aim to achieve zero-carbon energy for our operations by eliminating or offsetting Scope 1 and 2 greenhouse gases by 2025. Achieving our reduction goal requires implementing energy efficiency and modernization initiatives, utilizing renewable energy, establishing power purchase agreements, purchasing renewable energy certificates and carbon offsets, and transitioning to low-carbon energy sources throughout our operations.

As energy prices continue to rise and customer demand for low-carbon products increases, we will continue to focus on reducing our operational energy consumption and GHG emissions to support the resilience of our business.

RESPONSIBILITIES

Southwire recognizes our sustainable leadership responsibility to reduce the impact of our operations and to respond to evolving global environmental and business conditions, including increasing stakeholder and shareholder expectations to mitigate the effects of climate change and GHG emissions.

Southwire's corporate sustainability department, with support from our business group leaders, operations environmental staff, energy procurement team, and others, is responsible for the combined management of our overall energy and emissions strategy. The sustainability and energy procurement staff evaluate opportunities for renewable energy procurement and deployment, and the operations teams look for options to implement energy-savings measures at the site level. Our EVP, General Counsel and Chief Sustainability Officer is responsible for overseeing energy consumption data collection, GHG emissions calculations, performance against company-wide targets, data reporting and providing quarterly updates to the Board Sustainability Committee. In addition, the Sustainability Committee provides strategic direction and oversees the performance of our carbon reduction goal.

We also believe that by engaging like-minded organizations, we can share ideas and explore partnership opportunities to develop and implement sustainable solutions. Key partners helping us incorporate best practices into our energy and emissions reduction strategy include the [Sustainability Leadership Forum – Atlanta](#)—focused on identifying and addressing complex environmental and societal problems in business—and the [Drawdown Georgia Business Compact](#)—focused on achieving a just, prosperous and sustainable transition toward net zero carbon emissions in Georgia by 2050.

OPERATIONAL APPROACH: ENERGY & GHG MANAGEMENT

Our [Southwire Company EHS Management System EHS Policy and Principles](#) outlines our approach to protecting the environment and sustainably managing our energy usage through operational efficiency. In addition, we seek to reduce our energy and GHG emissions impacts by conducting internal and external benchmarking and audits and driving accountability through partnerships and specialized management teams that share best practices. As Southwire grows, we strive to manage and reduce energy usage and operational emissions annually. In 2020, we established our Carbon Zero objective—a goal to achieve 100% zero carbon energy for our operations by 2025, compared to our 2018 baseline, which will address our Scope 1 and 2 GHG emissions.

Our most significant contributors to energy consumption and air emissions result from operational combustion of natural gas and electricity use at our larger, more complex manufacturing plants. Southwire's engineering team continues to conduct as-needed audits to identify efficiency opportunities and support long-term project activities. Once identified, we are committed to utilizing the most energy-efficient technology when practical to reduce both costs and environmental impacts.

As a result of equipment and system modernization and expansion at 10 of our manufacturing sites in 2021, we expect to show significant energy reduction results in 2022.



ENERGY & GHG EMISSIONS



GROUNDBREAKING COPPER ROD MILL IN CARROLLTON, GEORGIA

In February 2021, we broke ground on a 100,000 square-foot Southwire Continuous Rod (SCR®) plant in Carrollton, Georgia, with the capacity to produce more copper rod than any other SCR rod system in the world. The new facility will reduce environmental impacts by replacing the existing facility on the same site, upgrading equipment and supporting our 2025 Carbon Zero initiative through an energy partnership with the Carroll EMC utility to provide 100% renewable electricity for the facility.

“Southwire is investing in a multimillion-dollar modernization initiative that will allow us to best serve our customers, increase our efficiency and introduce newer and better equipment, systems and technology. In doing so, we’re reaffirming our commitment to providing a work environment that supports the wellbeing of our employees, our communities and the environment—for today and for the future.” - Rich Stinson, President and CEO.

ON-SITE APPROACH: RENEWABLE ENERGY PROGRAM

In addition to reducing our operational emissions through modernization and efficiency, Southwire is committed to increasing on-site solar energy generation and expanding our renewable energy portfolio to further reduce Scope 1 and 2 GHG emissions. This reduction is crucial to helping Southwire achieve our zero carbon objective, and we believe renewable energy is one “lever” in our portfolio of options to achieve Carbon Zero.

In 2021, we completed the installation of a solar generation system at our corporate headquarters in Carrollton, Georgia. The system includes two electric vehicle (EV) charging stations, two solar picnic tables and a solar canopy located over our expectant mother and accessible parking areas. In addition, we also installed new EV charging stations at our Southwire Family Medical Center in Carrollton, Georgia and our plant in Heflin, Alabama. Completion of projects in 2021 brings our company-wide total to three solar installations and six EV charging locations.

Recognizing the need to support our employee vehicle emissions strategy and the transportation sector’s electrification goals, we plan to install additional EV charging stations at our plants in Florence, Alabama and Bremen, Indiana in 2022.

“I was excited to be given the opportunity to manage the installation of our electric vehicle charging infrastructure when I joined the company in 2021. I am proud to work for a company that is serious about being sustainable.”
- Adam Carver, electrical engineer



ENERGY & GHG EMISSIONS

PERFORMANCE

As we continue to grow Southwire operations responsibly and respond to stakeholder expectations to reduce environmental impacts, management of our GHG emissions is crucial to remaining competitive and improving the cost and access to capital.

We also believe that energy efficiency; replacing carbon-intensive energy with renewables; sourcing renewable energy; purchasing renewable energy credits or certificates; and purchasing carbon offsets allow us to continue making progress towards our Carbon Zero objective. Please see the [GRI Index](#) in this report to view Energy and Emissions metrics.

RENEWABLE ENERGY PURCHASING PROGRAMS

In 2021, Southwire signed a ten-year contract with Georgia Power to participate in their Customer Renewable Supply Procurement (CRSP) program. Beginning in 2024, Georgia Power will retire renewable energy credits (RECs) on behalf of Southwire for our allocated portion of the CRSP utility-scale renewable energy generation portfolio. As part of our layered approach to achieving Carbon Zero, participation in the CRSP program is anticipated to offset approximately 6% of our carbon footprint.

MATERIALS, RECYCLING & CIRCULAR ECONOMY

APPROACH

At Southwire, we recognize the advantages of materials management and a lower environmental footprint for company success. As a materials-intensive business, significant opportunities exist to minimize the resources we consume, reduce the waste and scrap we generate, recycle valuable materials to preserve critical resources, keep costs down and effectively manage our waste-related risks.

To help lower our footprint, we seek to incorporate sustainable characteristics that include recycled materials into our product design, manufacturing and packaging operations. In addition, we focus on increasing our recycling efforts and expanding material reuse strategies at the end-of-life in line with circular economy principles. As circular

economy strategies become increasingly important, Southwire's efforts help minimize our raw material consumption, reduce carbon emissions across the value chain, limit resource shortages due to finite natural resources supply and reduce the end-of-life impact of products and packaging downstream. Together, these strategies help us contribute to broader circular solutions that include breakthroughs within our value chain.

RESPONSIBILITIES

Southwire strives to continuously improve the value and responsibility of our products while also balancing stringent industry, customer, and regulatory performance requirements, as well as material and safety standards that pose obstacles preventing the use of many alternative and recycled content inputs. To address barriers, we continue to explore input and waste reduction opportunities that help us manufacture safer, efficient and more sustainable products.

Product responsibility drives our operations, and we aim to:

- » Utilize recycled materials and minimize unnecessary content and packaging
- » Minimize or eliminate inputs with negative environmental and health impacts
- » Reuse materials at the end of a product's useful life

Our purchasing and other policies guide our materials management and help us limit the use of production inputs that have environmental regulatory concerns.

As part of our purchasing policy, our Material Request Instructions detail what employees must do to receive approval for a new material; this includes submitting a Safety Data Sheet for review and approval by facility safety and environmental coordinators. Beyond these guidelines, we continue to reduce the impact of our products by encouraging employees to find safer and more environmentally friendly input alternatives.

As a redefined material topic in 2021 now including circular economy, topic governance has not been formalized. However, Sustainability responsibility resides with our EVP, General Counsel and Chief Sustainability Officer.

MATERIALS, RECYCLING & CIRCULAR ECONOMY

As we grow, diversify and expand our business into services such as the repair and refurbishment of wire and cable, we are able to support the circular economy and our broader financial and environmental sustainability goals.

One area where we reduce our resource and material consumption impacts is packaging. Our wire and cable packaging team frequently includes Southwire's five core sustainability tenets in the design and improvement of our products. In addition, the packaging group seeks to increase recyclability while discovering methods to save money and generate suggestions for sustainability initiatives and new product ideas. For example, the packaging staff currently works to use paper rather than plastic to wrap coils where possible. The team has also teamed up with a local recycling partner to transform **over three million pounds of scrap** insulating compound into raw materials for repurposed products. We are also looking for more opportunities to collaborate with customers to promote increased packaging recycling at the jobsite.

Our TCAS team also develops and assesses product and packaging designs to reduce costs and waste while increasing recyclability and reuse. One way they support recyclability and reuse is by participating in North American Extended Producer Responsibility (EPR) programs helping to identify circular economy issues that include lifecycle costs and impacts and responsibility approaches addressing the end-of-life of products. As an outcome of the EPR programs, our TCAS team has successfully developed products and packaging designed for Stewardship Ontario's Blue Box collection and recycling program.

Further supporting Southwire EPR efforts, Éco Entreprises Québec, Resource Productivity and Recovery Authority in Ontario, and other provincial locations help recover and recycle our products, packaging and components in Canada. We also follow the European Waste Electrical and Electronic Equipment Directive (WEEE) end-of-life regulation that encourages collecting, treating, recycling and recovering electrical and electronic equipment waste. In response to the WEEE, Southwire locations collaborate with ViaTeK Solutions, a leader in environmentally responsible recycling programs to manage waste.

To achieve greater circularity through enhanced collection and recycling systems, we collaborate with the nonprofit Producer Responsibility Organization to help manage the lifecycle of our retail tools, lighting, packaging and select wire and cable products.

SIMPULL SOLUTIONS®

Southwire SIMpull Solutions® services and products eliminate waste at the jobsite and support our circular economy ambitions by extending their useful life through a lease, collection and refurbishment program as well as a repair and return program. Through these programs, Southwire's Machine Services Group helps 100% of SIMpull® reels retain value and avoid landfills while also helping to reduce GHG emissions, resource use and waste associated with new product manufacturing and ownership.



PERFORMANCE

Our transition to a circular economy allows Southwire to enhance product innovation while transforming our business model to keep resources within the value chain and extend the life of products. In addition, investing in the circular economy helps Southwire meet carbon reduction goals related to Scope 3 customer emissions while also helping to meet sustainable business growth objectives through efficiency cost savings associated with the extended life of products.

To assess the effectiveness of our efforts, we evaluate our performance by tracking year-over-year disposal and recycling metrics along with reels repaired, returned and recycled. In 2021, our recycling and disposal volumes increased due to modernization and expansion projects at approximately ten Southwire sites. The increased landfill volume includes soil and debris from demolition work, while the recycling quantity includes concrete shipped off-site for recovery and reuse. To further evaluate our circular economy efforts, we are developing metrics and goals that will be implemented in the near future. In addition to tracking our impacts, we also assess product responsibility and performance internally through consumer feedback, satisfaction and sales results. Please see the [GRI Index](#) in this report to view Materials, Recycling and Circular Economy metrics.

WATER & WASTEWATER



APPROACH

Southwire responsibly manages water resources through water quality and quantity policies and regulatory compliance. We prioritize operational water use in manufacturing and mill locations with high water use processes, including contact and non-contact cooling. Our approach allows Southwire to avoid environmental, financial and reputational consequences. In addition, we aim to manage and reduce our water impacts by conserving and controlling water usage in manufacturing facilities and office spaces, monitoring total withdrawal by source and using recycled or lower quality water for processes whenever possible.

Other approaches to decreasing our water impacts include careful compliance with river, stream and lake water quality standards near our sites by reducing the release of chemical and physical contaminants. In addition, we closely monitor stormwater runoff and wastewater discharge at Southwire locations near waterways to mitigate any adverse impacts on nearby communities.

Ultimately, our management approach, including quality, quantity and compliance, allows Southwire to maintain our environmental, financial and reputational performance. However, due to increasing regulatory standards and environmental concerns, we are developing a holistic water and wastewater management strategy that includes conservation measures and incorporates circular economy principles that maximize water recirculation and reuse in Southwire operations.

RESPONSIBILITIES

We must comply with strict regulatory requirements, including maintaining the appropriate permits for wastewater discharge to surface waters and local sewer systems and for managing stormwater runoff. In addition, our Southwire EHS Policy and Principles guides our use of water and wastewater. While each Southwire site is responsible for managing water use and wastewater discharge locally, ultimate accountability for our environmental performance rests with the EVP of Operations. The EVP of Operations is responsible for overseeing our water programs' performance and reporting updates to the board, which offers strategic direction.

WATER MANAGEMENT

To help ensure the long-term quality and supply of water in the communities where Southwire operates, we closely monitor water discharge and utilize sustainable withdrawal practices.

We source non-contact cooling and steam generation water for manufacturing from municipal water supplies, groundwater and harvested rainwater. Our facilities must also maintain applicable water withdrawal permits, stormwater discharge permits, stormwater no-exposure exemption certifications and sewer discharge permits. Where water discharge capacity is available, Southwire locations discharge manufacturing process wastewater to the local sewer authority following local sewer ordinances and permits.

At the two locations where adequate municipal sewer capacity is not available, Southwire discharges to local waterways in accordance with our National Pollutant Discharge Elimination System (NPDES) direct discharge permits.

In addition, locations with stormwater exposed industrial activities are subject to NPDES requirements and must also operate under state or local permits that specify appropriate compliance procedures. NPDES permits require Southwire to meet stringent discharge requirements, and all permits and permit applications are subject to agency and public review. In cases where Southwire facilities are not required to obtain a sewer permit, water discharges must follow local sewer ordinance requirements.

We aim to exceed regulatory requirements by voluntarily reducing our water consumption and impact. In 2021, we continued to require all Southwire locations to identify and implement at least one water or energy savings project.

WATER & WASTEWATER



To help locations choose projects, the operations environmental staff provides a list of potential high-impact projects identified during water audits conducted in previous years. For example, due to the site-led water quality and use improvements of a reverse osmosis system installation in our Starkville, Mississippi location, the site reduced water consumption by almost **20%** in 2021, reduced natural gas usage by **10%** and produced an operational cost savings of approximately **\$52,000** compared to 2020.

In addition, we monitor compliance efforts and assess the impact of Southwire activities through visual inspections, automated electronic water quality alerts and sample analyses to prevent water-related incidents. All water monitoring pollution parameters are location-specific, and monitoring frequencies may be continuous, daily, monthly, quarterly, annual, or as directed by permit and pollution prevention program requirements. When warranted, Southwire implements actions such as enhanced best management practices, engineering controls and administrative procedures that are aimed to identify, address and correct negative impacts.

ENVIRONMENTAL MANAGEMENT SYSTEMS

In addition to permitting and regulatory requirements, Southwire operates four facilities with third-party verified environmental management systems (EMS). Our utility product plants in Huntersville, North Carolina; Hawesville, Kentucky; and Carrollton, Georgia are ISO 14001 certified, and our Tecate Plant is certified under Mexico's Clean Industry Program. We have also implemented ISO-like EMS at nine other manufacturing locations. As part of the Southwire EMS process, we require each site to conduct an "aspects and impacts" analysis to identify critical site activities that may adversely affect the environment. Once we identify the critical activities, each site is required to develop and implement a management strategy, policy or plan used to track and manage these activities.

PERFORMANCE

Southwire water usage fluctuates according to weather conditions, facility product mix, operational conditions and additional factors at our individual locations.

To address facility fluctuations and increase water efficiency and reuse, we are upgrading infrastructure technology and improving the water strategy in our environmental management system. However, while upgrades are helping increase water savings, the sensitivity of some equipment has slowed our overall water reduction progress. As a result, we did not achieve our target of a 10% reduction in water use intensity by 2021 over our 2016 baseline. However, in 2021, we achieved an 11% reduction in overall water use compared to our 2016 baseline.

In addition, we continually assess our water management efforts and incorporate circular approaches such as water recirculation and reuse to maximize efficiency. We also encourage accountability and leadership for resource-saving efforts, and environmental measures are included in the individual performance metrics for leaders who are directly involved with helping the company meet environmental performance goals. Please see the [GRI Index](#) in this report to view Water & Wastewater metrics.

LIVING WELL

At Southwire, our people are our greatest asset. To develop and support our employees at all locations, we focus on employee health, safety, wellbeing, diversity, engagement and retention. We maintain programs and systems to ensure that our employees are safe and healthy, and we invest in talent attraction, employee engagement and retention programs to help our employees thrive. In addition, we provide resources and support to help foster a sense of inclusivity, belonging and purpose that inspires our teams to do their best and bring their best selves to work.



DIVERSITY, EQUITY & INCLUSION



A focus on Diversity, Equity and Inclusion (DEI) is critical for Southwire and our continued success. We are committed to fostering an inclusive environment where individuals from diverse backgrounds are treated equally and feel comfortable expressing their thoughts and perspectives.

Over the last several years, we have prioritized and accelerated our internal and external efforts to provide fair and equitable opportunities. We believe every Southwire employee can make a difference, and we are committed to evaluating our systems, programs and practices to ensure all Southwire employees are supported. In addition, we work to understand where biases exist, and we take corrective action to address inequities.

APPROACH

At Southwire, we maintain an environment where respect and inclusion lead all we do. We also help ensure that all employees—regardless of their gender, age, cultural background, ethnicity, race, religion, sexual orientation, or any other identifying characteristic—have equal access and opportunity to learn, grow and succeed.

SOUTHWIRE DEI METRICS

We recognize the place metrics play in overall company accountability, helping to ensure employees feel empowered to participate fully and take advantage of growth and equity opportunities. We track a variety of internal metrics including average years of service, percentage of female employees, average age, percentage of employees from underrepresented communities (URC) and turnover of high potential employees. To further support accountability, we established a new internal DEI dashboard in 2021. The dashboard provides greater insight into company performance by tracking DEI metrics quarterly.

We took additional steps in transparency and visibility by changing how we calculate some metrics. Changes include moving from a broad measure of People of Color (PoC) to tracking our diversity progress on a person-by-person basis for individual ethnic minorities. This modification helps Southwire make more deliberate operational and business decisions, and it helps to establish a clear picture of progress across all diversity and inclusion domains. To better understand engagement efforts, we also began tracking overall participation in our employee resource groups (ERGs) and are considering including career band, location, gender and ethnicity metrics. Our employee engagement survey also helps us measure and track inclusion through the analysis of responses based on demographics.



CEO ACTION FOR DIVERSITY & INCLUSION

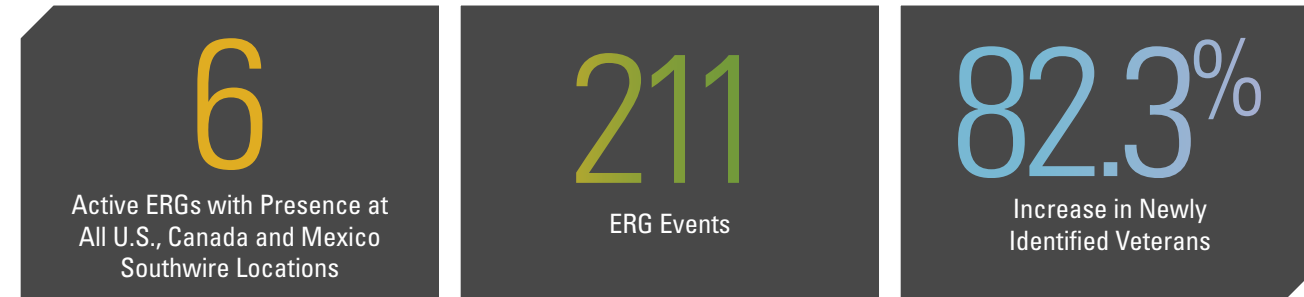
In 2020, to support a more inclusive workplace for employees, communities and society at large, our CEO signed the CEO ACTION FOR DIVERSITY & INCLUSION. Our commitment is driven by a realization that addressing diversity and inclusion is not a competitive issue, but a societal issue. Throughout 2021 into 2022, we prepared for the launch of our The Power Behind the People™ DEI website dedicated to our mission of building and celebrating the value of diverse backgrounds, equity in opportunity and inclusivity in action.

DIVERSITY, EQUITY & INCLUSION

STRATEGIC DEI FOCUS AREAS IN 2021

Southwire leverages seven strategic areas to help focus and drive our DEI mission, including Employee Resource Groups, external partnerships, talent development, supplier diversity, inclusive recruiting, Giving Back, and advocacy.

EMPLOYEE RESOURCE GROUPS



EXTERNAL PARTNERSHIPS



TALENT DEVELOPMENT



SUPPLIER DIVERSITY



INCLUSIVE RECRUITING



GIVING BACK



DIVERSITY, EQUITY & INCLUSION



2021 SUMMER ENRICHMENT SERIES

Throughout August 2021, the Southwire Diversity, Equity & Inclusion (DEI) team hosted a Summer Enrichment Series that provided helpful tools, virtual events and learning opportunities. The series focused on our four fundamental values of empowerment, trust, consistency and inclusion. Key topics covered in the series included:

- Cultivating trust with peers
- Positive employee engagement impacts
- Fostering a diverse and inclusive work environment

Approximately 500 employees from more than 40 Southwire locations participated in 20 events, including knowledge bursts, keynote speakers, fireside leadership chats, speed mentoring sessions, podcasts and other resources from Southwire leaders as well as Wounded Warrior Project®, Catalyst, and Women in Manufacturing (WiM).

RESPONSIBILITIES

Governance and oversight of DEI efforts are led by the DEI center of excellence, newly established in Q1 of 2021, and Southwire's DEI Director. While DEI has been a strategic priority to Southwire for several years, the establishment of the DEI center of excellence as a department fully dedicated to this space was a major milestone for the organization. In addition, our CEO DEI Council — comprised of Southwire's CEO, his direct reports and champions from each ERG — and our Executive DEI Council — comprised of Southwire's CEO, his direct reports, Senior Vice Presidents and key business partners — meet twice a year to provide updates and discuss DEI strategy efforts and programs at quarterly meetings.

As a signatory to the [United Nations Global Compact](#), Southwire fully supports Principle 6, which states: "Businesses should uphold the elimination of discrimination in respect of employment and occupation." We outline our commitment to equal employment opportunity in our Employee Handbook. We also cover additional non-discrimination measures in the Southwire Anti-Retaliation Policy, which prohibits retaliation for any protected activity, and the Pay Transparency Nondiscrimination Policy, which protects employees or applicants who inquire about, discuss or disclose their pay or the pay of another employee or applicant. To further encourage an inclusive workplace, we maintain an Anti-Harassment Policy and provide disability accommodations, religious accommodations and paid time for nursing mothers.

PERFORMANCE

Recognizing the opportunity to build more diverse and inclusive manufacturing leadership teams, Southwire partnered with Women in Manufacturing and sponsored employees to participate in the pilot of their Empowering Women in Production program. The 20-week program focuses on growing women with leadership aspirations, preparing them for the next step in their careers and developing a female operational leader talent pipeline. Southwire is excited to have graduated eight female leaders from the 2021 program.

Additionally, in 2021 we committed \$325,000 in Giving Back funds to URCs. We fully utilized the budget and supported various organizations, including the Wounded Warrior Project, Women in Manufacturing, Atlanta University Center Consortium (AUCC), 100 Black Men of Atlanta, Catalyst and the Human Rights Campaign.

For more information on our charitable efforts, please see the Giving Back section of this report. To explore Southwire DEI efforts further, please visit our [DEI website](#). Please see the [GRI index](#) in this report to view DEI metrics.

EMPLOYEE ENGAGEMENT & RETENTION



Employee engagement and retention are critical to maintaining successful organizations. Actively engaged employees are 21% more profitable, 17% more productive and 41% less likely to have absentee issues¹. We believe that by engaging employees, keeping them motivated and empowering them to make a difference, they find deeper connections to and meaning in their work. We also feel that by empowering our employees we can retain top talent and achieve our business goal of a strong, sustainable Southwire through positive financial performance and increased productivity.

APPROACH

Southwire recognizes that to retain employees and develop leaders, we must cultivate a culture focused on employee success and implement opportunities to grow job contentment, accomplishment, satisfaction and motivation. Therefore, to help retain and engage top talent, we commit to providing unique professional development opportunities that help employees connect to our culture and enhance their skills. Supporting employees also allows Southwire to strengthen our workforce, improve customer satisfaction and achieve better business outcomes.

¹Gallup, August 2020.

We use data-driven approaches to manage employee work experiences. We take a holistic approach to employee engagement by collecting feedback at three critical phases of the employment journey:

- Hiring
- Onboarding
- Exit

Additionally, we partner with Peakon, a subsidiary of Workday, to conduct annual Living Well Engagement Surveys that capture data for all three phases. These surveys collect anonymous employee data to help identify engagement and retention trends and opportunities. Each survey features 15-20 questions that ask employees to rate their experience with essential drivers including management support, peer relationships and freedom of opinion. Surveys also allow employees to leave contextual comments and provide feedback that help leadership understand employee needs. We believe that by surveying employees at different stages of employment, we are better able to identify areas for improvement and develop strategic efforts to engage and retain them—especially during the critical first 90 days of employment.

TALENT DEVELOPMENT

We utilize a company-wide virtual Performance Management competency model to help employees understand and grow their strengths. Integral to the process, we focus on helping to develop leadership skills and attributes unique to Southwire culture and articulate their implications for fostering our culture and driving performance.

In support of fundamental leadership development and building organizational capability, we train and expect Southwire people managers and front-line leadership to master core competencies identified by their roles. Our educational series, *Your Learning Your Way*, also helps embed core competencies and is open to all interested employees.

Recognizing the value of mentorship, we also engage Southwire employees through the Southwire Link Mentorship program. We are excited about this step in our inclusive employee development evolution and are proud to make this applicant-based mentorship program available to all employees.

Please visit the [Southwire Learn & Grow](#) career page to learn about more professional development opportunities.

EMPLOYEE ENGAGEMENT & RETENTION



PERFORMANCE

In 2021, Southwire experienced increased employee turnover, especially within the first 90 days of employment—something we are treating very seriously. The “Great Resignation,” a byproduct of the COVID-19 global pandemic, continued to produce significant turnover rates across all industries. In addition, the Bureau of Labor Statistics reported that manufacturing quit rates (voluntary turnover) were at 2.5% in December 2021, with an annualized rate of 30% during the same period year-over-year. To address the turnover challenge, Southwire formed an internal team of People & Culture employees from across the company tasked with evaluating needs related to building culture and increasing retention. During this same timeframe, Southwire also observed higher engagement scores among our ERGs, sustaining a monthly employee engagement rate of at least 80% across our employee population.

To improve engagement and retention performance, Southwire teams are increasing the frequency rate of employee surveys and employee engagement through 2022. We also strive to improve our overall employee Net Promoter Score (eNPS) by empowering leaders to make long-term improvements in the areas that matter most to employees. Improvement areas include enhanced onboarding to make the process more concise, targeted and relevant to employee groups. Southwire will continue to improve the onboarding experience through 2022 and beyond. Please see the [GRI Index](#) in this report to view our Employee Engagement and Retention metrics.

SOUTHWIRE CANADA RECOGNIZED AS GREAT PLACE TO WORK

In March 2021, Southwire Canada was recertified a Great Place to Work® using the Great Place to Work® Trust Model® measuring five key dimensions: Credibility, Respect, Fairness, Pride and Camaraderie. Our certification demonstrates dedication to Southwire employees, communities and other stakeholders.

“This certification is a great recognition of our employees and our culture,” said Tim King, Southwire’s president in Canada. “It reflects our core beliefs of Southwire’s founder, Roy Richards, Sr., who regarded Southwire’s people as our most important and influential asset and, after more than seventy years of successful business, this still remains true.”



TALENT ATTRACTION



Over the next decade, an estimated 3.5 million US manufacturing jobs will be needed to fill production demands¹. To bridge the projected industry hiring gap, the Southwire talent acquisition team seeks to identify, attract and retain top talent. We are committed to building a skilled, innovative and diverse workforce that will help identify sustainable solutions and meet changing business needs. This inclusive workforce will be built on empowerment, trust, consistency, and inclusion. In addition, the team aims to understand emerging employment needs from the next generation. By investing in our employees, we believe that we can create a positive environment that helps ensure the long-term sustainability of Southwire.

APPROACH

To attract top talent, we offer competitive financial and non-financial benefits (i.e., Total Rewards) that include employee and professional development programs and tools for building a new and skilled workforce. In addition, we offer a culture of inclusion, respect and collaboration that allows Southwire employees to feel valued and supported in their work.

¹US manufacturing competitiveness and the looming skills gap | Deloitte Insights

TOTAL REWARDS

Total Rewards include perks, discounts and benefits for employees and their families focused on holistic employee support that includes focuses on health, community, social, financial and emotional opportunities.



STAYING HEALTHY

Medical, dental, vision and prescription drug insurance, future moms' program, LiveHealth Online, 24/7 NurseLine, and onsite-pharmacy and doctor's office.



LIVING YOUR BEST LIFE

Paid time off, healthy vending and fruit, employee assistance program, fitness center, gym membership reimbursement, employee discount, Southwire store, and parental leave.



CONTINUING YOUR EDUCATION

Performance management, people manager and front-line leadership training, tuition reimbursement, professional and technical certifications, and service awards.



PLANNING YOUR FUTURE

401(k) retirement plan with matching contribution, basic life and accident insurance, life insurance, retirement readiness counseling.



GETTING PAID

Competitive base pay, profit sharing, holiday bonus, incentives, travel pay, relocation assistance, holiday gift.



GIVING BACK TO YOUR COMMUNITY

Matching programs, volunteerism, employee resource groups (ERGs), educational partnerships.

TALENT ATTRACTION

Providing diverse talent pipelines is essential to building the most competitive teams in the industry. In 2021, Southwire established a team to manage university, trade school and alumni engagement programs focused on expanding vertical and regional recruitment efforts. Partners include Georgia Tech's Office of Minority Educational Development (OMED), Auburn University's 100 Women Strong, Auburn University's Engineering Academic Excellence Program, the University of West Georgia, and the Atlanta University Center Consortium (AUCC). Highlight programs in 2021 include:

12 FOR LIFE®

Growing to seven school systems since 2007, Southwire and schools in Georgia and Alabama work to help at-risk students with an educational recruitment program. The program provides part-time employment and training inside a modified Southwire manufacturing environment while allowing students to complete their education. In return, Southwire helps develop a skilled workforce for the future.

SOUTHWIRE ENGINEERING ACADEMY (SWEA)

Our Carrollton, Georgia high school science, technology, engineering and mathematics (STEM) cooperative internship program allows students to apply STEM competence to real-world manufacturing environments. In 2021, due to the ongoing pandemic, we hosted the SWEA program virtually with 30 students with a broader focus and inclusion of additional pathways beyond the typical STEM option, including corporate communications and marketing.

SOUTHWIRE BUSINESS LEADERS PROGRAM (SBLP)

Our collaboration with the University of West Georgia's Richards College of Business focused on providing opportunities for students to work with a Southwire leadership team to develop real-world business and community initiatives. In 2021, the second cohort of SBLP students completed the program.

SOUTHWIRE MAINTENANCE APPRENTICESHIP PROGRAM

Our two-year Maintenance Apprenticeship Program focused on developing a pipeline of skilled maintenance technicians by providing classroom and customized on-the-job training to apprentices hired as full-time employees. In 2021, two apprentices successfully graduated the program and were promoted to Maintenance Supervisors at Southwire.

PERFORMANCE

Positive talent attraction metrics are critical during high employee demand and turnover periods. During the "Great Resignation," a low unemployment rate and labor shortages created challenges for filling employment positions. Southwire responded to the situation in several ways, including reviewing and adjusting compensation as needed to remain competitive and leveraging social media technology and additional job boards to promote brand awareness and job openings.

Further, in response to evolving employee preferences, the Southwire recruitment strategy has changed to embrace more remote work and flexible hybrid work schedules, which we see as essential in attracting new talent and building a modern workplace. Flexible work schedules allow us to attract and retain top talent while improving employee engagement and productivity. In addition, as noted in our employee surveys, flexible programs result in employees feeling more supported, knowing they can adapt their job to their lives rather than the other way around.

To help monitor the effectiveness of our efforts, Southwire utilizes key internal metrics, including employee turnover rates. Due to our resilient recruitment efforts and updates, in 2021, we observed an impressive increase in our New Employee Hires Rate to 26.0%, compared to 17.0% in 2020 and 13.5% in 2019. Please see the [GRI Index](#) in this report to view our Talent Attraction metrics.



PARTNERSHIP WITH THE ATLANTA UNIVERSITY CENTER CONSORTIUM

Southwire is pleased to announce our new partnerships with the Atlanta University Center Consortium (AUCC) and Electro-Federation Canada (EFC), providing expanded educational opportunities for Black and woman students. The partnership with the AUCC focuses on fostering a community of diversity, equity and inclusion in the workplace. Our collaboration with the AUCC will provide immersive educational possibilities and scholarships to students in the consortium's dual degree engineering program. In addition, through this program, AUCC engineering students may pursue various employment opportunities in the electrical sector, including student internships, scholarships, and future job opportunities at Southwire.

WORKPLACE SAFETY & EMPLOYEE WELL-BEING



Our heritage as a family-owned company inspires us to treat our employees like family and contribute to their overall physical and emotional well-being. At Southwire, the foundation of all that we do in business rests on our EHS and sustainability values. Our employees' safety, health, well-being and community partnerships remain essential to maintaining our competitive advantage. Southwire's organizational strategy and planning focus on building organizational capability, accelerating growth and driving operational excellence. When our employees are safe, healthy and engaged, Southwire's performance is at its best.

APPROACH

Safety is core to our culture. We are committed to achieving best-in-class safety performance at Southwire by effectively managing workplace safety and health risks and providing a safe workplace for our employees and contractors. We do this by eliminating hazards and implementing safety training. We also provide resources to our employees and contractors that promote physical and emotional well-being practices, which encourages employees to take responsibility for their well-being, protects their quality of life and improves working conditions. We use a wide range of initiatives, governance mechanisms, policies, systems and training to continually improve our safety and health performance with the goal of zero injuries and illnesses at the forefront.

OSHA VOLUNTARY PROTECTION PROGRAM

One of our ongoing, strategic sustainability objectives is to have manufacturing and warehousing operations certified to the OSHA Voluntary Protection Program (VPP), where applicable. Each site has employee-driven safety steering committees, responsible for overseeing OSHA VPP compliance. For international locations and other facilities with a specific driver, we are pursuing ISO 45001 or an in-country equivalent certification. Both OSHA VPP and ISO 45001 certifications offer a standard of compliance that goes beyond regulatory requirements and requires the establishment of systems focused on management commitment, employee involvement and continuous improvement, which will optimize performance and sustain gains. To date, Southwire has 16 locations with certified health and safety management systems: 14 OSHA VPP Star sites, one Empresa Segura (Mexican standard), and one OHSAS 18001 (precursor standard to ISO 45001).



WORLD CLASS SAFETY CULTURE

Established in 2015, our world class safety culture (CZ) provides guidelines to new and old locations on how to become a world-class organization in health and safety. CZ aims for zero injury and illness across all Southwire sites in order to achieve best-in-class safety performance. Progress towards our safety goals is driven by our SVP of EHS, overseen by the EVP of Operations, and reported on a quarterly basis to the Board Sustainability Committee.

Our approach allows for flexibility at each site to deploy a site-specific strategy and highlights areas describing excellence and accountability. Key areas of focus include, but are not limited to:

- Leadership commitment
- Responsibility and accountability
- Communication and training
- Incident management
- Hazard identification and controls

WORKPLACE SAFETY & EMPLOYEE WELL-BEING



HAZARD RECOGNITION & RISK MANAGEMENT

The foundation of our EHS culture concerns hazard recognition at all levels of the organization. We have several platforms for employees to address hazardous risks and concerns in the workplace, including routine assessments and reporting mechanisms. We conduct focused assessments in key areas, including machine guarding, vehicle-pedestrian interfaces, and electrical and mobile equipment. In addition, we regularly conduct inspections to identify the potential for significant injury or fatality (SIF) risks. The findings from these audits are risk-ranked based upon severity, frequency and probability of injury to provide a priority for corrective actions at each site.

Our Injury Free Event (IFE) reporting program is available to all employees and includes physical and behavioral observations and near misses. Our Just-Ask program is an anonymous reporting system that allows employees to report issues and personal concerns for instances in which other reporting systems are not proper or adequate. Additionally, we empower employees to utilize a Stop Work tool, an avenue for employees to voice concerns and have the authority to stop a job or process if there is a perceived safety risk.

Both employees and their leaders assist in incident reviews, develop corrective actions and oversee the implementation of corrective actions. All sites utilize the Daily Huddle Process for problem-solving events with cross-functional teams after EHS incidents. In 2021, we began conducting problem-solving events for leading indicators, not just lagging events, including near-miss events, reportable releases, notices of violations, first aids and significant injuries or illnesses. Our methods for investigation include, but are not limited to 5-Why, Failure Mode and Effects Analysis (FMEA), 8D and the Fish Bone Process. Additionally, facilities share best practices from across the company, allowing for cross-organizational learning. We share safety items for other sites to consider at bi-weekly conference calls with the site leaders, EHS professionals, divisional managers and operational leadership. We also have post-incident learning teams that conduct deep dives into latent health and safety conditions and evaluate at-risk behaviors associated with incidents.

PERFORMANCE

Southwire's most significant work-related hazards that pose a risk of high-consequence injury include mobile equipment interface, pinch points, caught-in, caught-between and struck-by injuries. Our main types of workforce injuries include lacerations, strains, sprains and contusions. Through data analysis and partnerships with cross-functional operations teams, Southwire can place a heightened focus on the critical activities and behaviors needed to reduce incidents across the organization. Each facility has its own performance targets and lead measures based on historic incident trends (leading and lagging) and risk areas associated with site-specific processes.

In addition, Southwire has long- and short-term goals to manage our performance when it comes to health and safety. We develop and refine our goals and objectives from performance metrics of trend analyses. We utilize our short-term goals to develop key injury prevention strategies focusing on incident reduction. Our long-term goals focus on SIF risk reduction and strategic growth of the EHS management system, employee engagement and our world class safety culture. The SIF areas of focus include but are not limited to: electrical safety and work practices; control of hazardous energy; mobile equipment; confined spaces; fall prevention and walking/working surfaces; storage racking; robotics; and machine guarding.

ROBERT W. 
CAMPBELL
AWARD[®]

2021 FINALIST FOR THE NATIONAL SAFETY COUNCIL ROBERT W. CAMPBELL AWARD

In 2021, Southwire was a finalist of the National Safety Council Robert W. Campbell Award, which recognizes organizations for commendable leadership and excellence in integrating EHS management with business operations systems. Though we did not win, nomination for this award validates Southwire's strong EHS management system, performance and culture. This achievement is a direct reflection of our associates' hard work and dedication to keeping each other safe. As an organization, we are proud of our world-class safety culture and will continue to focus on our goal of zero injuries and illnesses in 2022.

GIVING BACK

At Southwire, we believe community engagement and partnerships, philanthropy and volunteerism go hand-in-hand with being a responsible business. We tie our success to the well-being of the communities we serve, and we take our responsibility to give back seriously. Our support includes employee volunteerism, financial contributions and in-kind donations. We also maintain and foster relationships with employees, customers, suppliers, friends, neighbors and other stakeholders through our Giving Back efforts. As a responsible business, we aim to make a lasting difference by investing in programs that create opportunities and build the capacity for individuals and organizations to thrive.



COMMUNITY ENGAGEMENT AND VOLUNTEERISM



Our engagement focus creates value for Southwire through initiatives helping to build thriving and prosperous communities with talented future employees. Our goal is to enable a future based on action, engagement and the facilitation of meaningful dialogue around issues that matter to the communities in which we live and operate.

Our Giving Back programs help us achieve our engagement and volunteering goals by providing support through community-based partnerships, donated goods and services, and employee-led programs and efforts that include skill-based volunteering. In addition, Southwire and our employees provide financial support and hands-on assistance to individuals and entire communities affected by natural disasters and emergencies.

APPROACH

Shared value is the core of Southwire's Giving Back program. We create shared value through our long-term commitments to customers and the communities where we live and operate. In addition, our culture of Giving Back supports shared value by leveraging Southwire resources and expertise to create positive social impacts through financial contributions, grant programs and volunteering.

To create shared community value, we focus our efforts on understanding the needs of our communities and engaging them with supportive measures that:

- Educate and develop long-term skills
- Inspire and build health through volunteering
- Revive and rebuild through disaster relief
- Brighten and support lives through charitable giving
- Protect and sustain the environment

Southwire's Communications and Giving Back teams are responsible for community engagement and philanthropy efforts including Project GIFT® and the POWER Fund, organized under the legally recognized 501(c)3 nonprofit Southwire CARES, Inc.

SOUTHWIRE CARES, INC.

Since 2004, Southwire CARES, Inc. has overseen all of our not-for-profit initiatives. Southwire CARES, Inc. is governed by a board of directors, which is made up of company leaders across our operations, including communications, manufacturing and distribution, corporate tax, and Giving Back management. Southwire CARES oversees our Project GIFT® program, as well as the POWER Fund.

POWER FUND

The Southwire POWER Fund, Inc., (Providing Others with Emergency Relief) provides short-term, emergency assistance to US-based employees and their immediate families who encounter hardship. The Fund offers both catastrophic grants and employee matching grants. Any employees of Southwire or its subsidiaries are eligible to receive a grant, as long as he or she meets the various requirements set forth by the Southwire CARES Board of Directors/Officers.

COMMUNITY ENGAGEMENT AND VOLUNTEERISM

PROJECT GIFT®

Southwire's Project GIFT® volunteer program leads all service-related initiatives and volunteering, partnering with organizations including Feeding America, Toys for Tots, Water Mission, Keep America Beautiful, Habitat for Humanity, and the American Cancer Society.

Project GIFT® Inspiration for Tomorrow efforts in 2021 included:

2021 Highlights	
Supporting Education	Southwire hosted its 17th annual Back to School giveaway, distributing more than 30,000 bags of free school supplies to children in need across all of Southwire's Giving Back communities. Distribution events included a drive-thru style event in some areas where community members could safely remain in their vehicles as volunteers loaded supplies into trunks to ensure contactless delivery, as well as direct-to-school distribution days in partnership with local school districts and counselors.
Supporting and Inspiring Health	Southwire expanded its commitment to COVID-19 relief by committing an additional \$500,000 focused in the areas of hunger and education. Additionally, Project GIFT® volunteers participated in virtual volunteerism by providing electronic cards of encouragement to patients at St. Jude and Children's Healthcare of Atlanta, and hosting a virtual concert to connect with elderly community members living in local nursing homes or assisted living facilities.
Supporting Disaster Relief	Project GIFT® teams hosted donation events in West Georgia, Kentucky, Indiana, and Illinois to support disaster relief efforts for tornadoes in Kentucky and surrounding states. These events collected seven tractor-trailers filled with much-needed relief items and Christmas gifts, and nearly \$30,000 in monetary contributions to further the relief effort. The generosity of Southwire employees, community members, volunteers, and local partners helped make our disaster relief effort a success.
Donations and Giving	Southwire's Project GIFT® program hosted multiple collection and fundraising events, including virtual events, in-person gatherings, 5Ks benefitting several organizations, lunch-and-learns organized by several charity partners and more. Events included our annual Project GIFT® two-day toy collection drive, where volunteers collected over 6,500 toys for children and families in need during the holidays.

PERFORMANCE

In 2021, Southwire partnered with Blackbaud to help track and manage charitable donations and employee volunteerism more efficiently through the online platform, YourCause. In addition to tracking hours, the platform allows employees to view and sign up for volunteer activities, and it allows Southwire to develop and host a trackable online application for charitable donation requests.

Southwire is committed to giving back. In 2021, despite in-person activities being affected by the ongoing pandemic, our employees found creative ways to give back safely through more than 5,000 hours of combined virtual and socially distanced volunteering.

In addition to volunteerism efforts, Southwire donated approximately \$200,000 to over 20 sustainability-related organizations and causes in 2021. Supported initiatives include the West Atlanta Watershed Alliance Proctor Creek Trash Trap Network Education Project, as well as a sponsorship of four e-recycling events supporting electronic waste reduction. We also provided a matching donation to The Ray for Georgia Gives Day to support modernizing the energy grid, boosting renewable energy generation and developing transportation electrification.

In light of the challenges posed by the pandemic, we adjusted the deadline for establishing electronics recycling programs in 100% of the communities where we operate to 2023.



DOING RIGHT

Success in today's business environment requires companies to act ethically, transparently and securely when preparing for and addressing risks related to cybersecurity, geopolitical disputes and supply chain issues. Utilizing responsible business practices guided by ethics, mutual respect, integrity and honesty allows Southwire to protect stakeholders while establishing trust. In addition, we understand that success built on responsible business practices also allows us to do right by those who matter most to our company when challenges arise.

CYBERSECURITY & DATA PRIVACY



Cybersecurity & Data Privacy is a critical element of Southwire culture and is vital to safeguarding customer, employee and supplier information. We are committed to maintaining secure information systems and protecting data confidentiality, integrity and availability.

We invest significant resources into protecting against unauthorized information access, use or disclosure. Our Information Technology Services & Enterprise Information Security teams work diligently to educate employees and help ensure our systems are secure. As a result, our employees understand that they are the first line of defense in protecting company and customer information from unauthorized access, use or disclosure.

APPROACH

Southwire recognizes the evolving nature of the cyber-risk landscape, and we continuously enhance our data and information infrastructure security systems to prevent breakdown or security breaches of critical information. Southwire performs multiple information security assessments and penetration tests on a yearly basis. Heightened risks in 2021 included more sophisticated and targeted spear-phishing assaults and the rise of ransomware attacks on corporations.

END-USER TRAINING AND EDUCATION

In 2021, Southwire expanded end-user awareness training and increased the frequency of company-wide phishing assessments. We design our cybersecurity training, drills and governance programs to address identified risks and engage and educate employees. We also developed additional training for critical user roles, senior-level executives and employees who travel regularly. Employee training includes strategies to identify, avoid and effectively respond

to potential threats inside and outside the workplace. In addition, we prioritize risk management by using actionable metrics, data and threat intelligence to monitor, protect and provide visibility into efforts. We also engage expert service providers as needed to develop additional threat responses and strengthen our efforts.

SOUTHWIRE INFORMATION SECURITY PROGRAM COMPLIANCE AND GOVERNANCE

Our information security program complies with the National Institute of Standards and Technology (NIST) cybersecurity framework. The Vice President of Enterprise Information Security is responsible for leading the program and reporting updates and incidents to the Information Security Oversight Committee (ISOC), Executive Leadership Team and the Board of Directors Audit Committee. The ISOC includes Southwire executives from Operations, Legal, IT, People & Culture, Modernization, Physical Security and Corporate Communications. This broad group of executives is responsible for providing a business-wide risk and opportunity perspective.

Management of cyber-related risks includes governance guidelines for Compliance, People & Culture, Connected Factory, Finance and Internal Audit programs. In addition, to understand business needs, Southwire embeds information security considerations into business activities.

SECURITY AND THREAT DETECTION

In 2021, we expanded our security and threat detection capabilities by establishing a security operations center-as-a-service that provides 24/7 firewall, network device, critical infrastructure monitoring and endpoint detection. The center is also optimizing Southwire's vulnerability management program by regularly scanning websites and internal and external endpoints to rapidly identify critical vulnerabilities and establish rapid responses for risk mitigation. Additionally, we optimized our incident response procedures in 2021 by creating individual cyber-incident response playbooks for various incident types, and we established a cadence for regular tabletop response exercises.

PERFORMANCE

As global conditions have necessitated, Southwire has continued to mature our information security program and will continue to do so in the coming years. While established business objectives and information security will remain the top driver of our security program, regular assessments utilizing the NIST cybersecurity framework will also provide a roadmap for targeted efforts to mature our cybersecurity program. In 2021, 98% of employees completed annual cybersecurity training; this number is up 24% from 2020 and up 48% from 2019.

ETHICS, ANTI-CORRUPTION & TRANSPARENCY



Organizations that put ethics, anti-corruption and transparency at the forefront of their business practices are more likely to avoid costly compliance problems and gain significant reputational and business benefits. We believe that an ethical culture starts with strong leadership setting the tone for the entire organization. As part of our Doing Right tenet, we foster a culture guided by the ethics of mutual respect, integrity, and honesty. We are committed to supporting those values in every aspect of our business and working lives, and we promise transparency and responsiveness when challenges arise.

APPROACH

Southwire seeks to ensure the highest standard of ethical business practices within our operations and is committed to keeping stakeholders informed about our actions and impacts related to ESG issues. Our [Code of Business Conduct – Doing Right, The Right Way](#) (The Code) provides our fundamental guiding principles and policies necessary to ensure and promote ethical behavior. The Code, including localized and translated versions, applies to all employees, subsidiaries and other affiliates globally.

ETHICS AND COMPLIANCE PROGRAM CHARTER AND ADDITIONAL GOVERNANCE AND RESOURCES

In 2021, we further strengthened our ethics and compliance program by publishing and implementing our first [Ethics and Compliance Program Charter](#) (The Charter) as well as our [Supplier Code of Conduct](#), our [Board of Directors Code of Conduct](#) and internal policy governance. These additions, along with existing program governance and policies, create a robust ethics and compliance system that allows Southwire to manage ethics, compliance and risk management goals responsibly.

Working hand-in-hand with our governance documents, the Southwire [Doing Right Connection webpage](#) and

employee portal provide tools and resources to employees and third parties doing business with Southwire. To promote a Doing Right ethical culture, we focus heavily on awareness, risk mitigation and continuous program improvement. As a signatory to the United Nations Global Compact (UNGC), Southwire fully supports [Principle 10](#) and fights all forms of corruption, including extortion and bribery. In addition, the [Fair Competition](#) and [Conflicts of Interest](#) sections of our Code – along with dedicated policies on anti-bribery, competition law, money laundering, human trafficking, conflict of interest, gifts and entertainment, whistleblower protection, and anti-retaliation – provide for ethical actions and for addressing corruption. Additionally, our [Doing Right Helpline](#), which is managed by a third-party provider, is available 24/7, 365 days a year, for reporting violations of policies or the law, or other business concerns.

CODE OF CONDUCT AND ANTI-CORRUPTION TRAINING AND PREVENTION

We conduct annual training to ensure that all employees understand Southwire’s commitment to ethical practices and compliance with anti-corruption laws. In 2020 and 2021, we partnered with a leading eLearning firm to develop our new Code of Conduct and Anti-Corruption trainings. The new trainings allow Southwire to effectively scale training and provide analytical outputs on employee training comprehension and improvement areas. Although the pandemic restricted travel and in-person ethics and compliance training, our new eLearning platform allows us to provide and track the completion of training sessions in real time. In 2021, 97% of US and international employees participated in Code of Conduct training, and all assigned employees completed Anti-Corruption trainings. In addition, we partnered with a leading third-party compliance screening service provider to implement new due diligence capabilities applicable to potential third parties with whom Southwire is considering entering into a business relationship. This new platform provides enhanced screening capabilities and a robust audit trail.

PERFORMANCE

Southwire commits significant time and resources to the continuous assessment and improvement of our Ethics and Anti-Corruption program. We accomplish this in a number of ways, including benchmarking our program against other companies’ programs; having our program assessed by Ethisphere, a global leader in corporate ethical standards; and conducting an enterprise-wide Ethical Culture Survey.

We engaged Ethisphere to help us conduct our second company-wide Ethical Culture Survey. While we celebrated a 53% survey participation rate, which is seven points above the Ethisphere benchmark of peer companies, we are taking steps such as shifting the time of year when we conduct the survey to increase our employee participation rate. Our goal is to achieve recognition on Ethisphere’s World’s Most Ethical Companies list by 2025.

SUSTAINABLE SUPPLY CHAIN & PROCUREMENT



We lead Southwire supply chain management efforts with strong ethics supporting our overall ESG business goals. In addition, we maintain rigorous procurement practices through our Supplier Sustainability Program. Our practices are responsible for helping to strengthen our supply chain and helping to ensure both the longevity of our company and the long-term availability of products for our customers. Our rigorous management practices also help Southwire meet the growing transparency demands of customers. To meet our own high quality and value expectations for finished products, we collaborate and share sustainable business best practices with key suppliers to guarantee that each input into our products adheres to the standards on which we have built our family-owned business.

APPROACH

We are committed to building and maintaining a sustainable corporate supply chain for all Southwire inbound and outbound logistics through our Supplier Sustainability Program. Our approach allows Southwire to maintain a stable, low-cost material supply for all inputs, including copper, aluminum, packaging, insulating and jacketing compounds, and other key materials. As part of the program, we practice ethical sourcing by incorporating environmental and social factors, including maintaining human rights and supplier diversity, and integrating local sourcing options (where feasible) into our supplier selection process. The program also enables us to evaluate our supply chain and supplier performance through surveys and on-site audits, which help ensure our partners adhere to Southwire values, requirements and applicable laws and regulations. We work closely with our critical suppliers in the US and internationally to maintain a preferred status, which helps prevent disruptions to our production operations.

We collaborate to proactively identify potential risks and opportunities, plan for disruptions and capitalize on new growth opportunities. Overall, our sustainable procurement program goal is to continuously improve operations and provide reliable services and products while helping preserve the planet for future generations.

In November 2021, the EVP, Metals became the Chief Supply Chain Officer (CSCO). The CSCO is responsible for overseeing all supply chain programs; developing and aligning a cohesive metals and non-metals procurement plan; and improving customer value through our best-in-class sustainable supply chain.

In addition, Southwire's strategic sourcing team, led by the CSCO, is directly responsible for monitoring and managing the overall sustainability of our supply chain through our Supplier Sustainability Program. Monitoring mechanisms of the program include key performance indicators such as quality, on-time delivery, cost containment and customer satisfaction. We improve our performance by setting diverse spending goals; expanding the reach of current and future supplier audits; and driving sourcing behaviors based on performance expectations and engagement.

In October 2021, Southwire published our first [Supplier Code of Business Conduct](#) (Supplier Code) outlining our standards and expectations for our supplier activities. Activities include anti-bribery and anti-corruption, labor and human rights, conflict minerals, health and safety, and environmental impact. The addition of our Supplier Code helps strengthen our overall foundation of Ethics & Compliance by helping to further ensure that Southwire and its business associates live up to our [Doing Right values](#). To view our Code of Business Conduct or our Supplier Code of Business Conduct, please see the resources section of our [Doing Right](#) webpage.

SUSTAINABLE SUPPLY CHAIN & PROCUREMENT



BHP CARBON NEUTRAL PILOT

In Q2 of 2021, Southwire and BHP, a global resources company, collaborated on a pilot program to explore technology, methods and approaches to enable tracing of copper products and associated carbon emissions through the supply chain to achieve ‘traced,’ ‘low’ or ‘net-zero’ carbon products. In the first phase of the pilot, Southwire and BHP successfully traced the emissions from BHP copper extraction in Chile to the production of rod in Carrollton, GA. The second phase of the pilot, to be completed in 2022, will extend through the manufacture of a typical wire product. Southwire is currently engaging with customers to identify potential downstream partners for a third phase in 2022 or 2023, which would include production and delivery of a low-carbon or carbon-neutral product to an end-customer. The ultimate objective would be to develop a carbon-neutral product line for key applications.

SUPPLIER SUSTAINABILITY PROGRAM

We actively manage 30 critical—high-volume and essential component—suppliers in our Supplier Sustainability Program. Through this program, Southwire:

- Distributes our Global Supplier Sustainability Manual
- Requests annual supplier submissions of environmental, social and governance information
- Conducts on-site audits of supplier environmental, social, governance and quality management systems

STRATEGIC SOURCING & PROCUREMENT

We carefully manage supply chain logistics to drive down costs and minimize environmental impacts, including the emissions from road transport. Management also includes analysis of raw material locations, so we can source locally when possible. To further address shipping impacts, we encourage contract carriers to participate in the EPA’s SmartWay program designed to advance sustainable transport by measuring, benchmarking and improving the efficiency of routes. In 2021, 93% of Southwire’s annual freight spend was dedicated to SmartWay certified carriers. We also minimize impacts by utilizing rail and intermodal transportation when feasible.

Additionally, we maintain high supplier standards. These standards are defined by Southwire’s Global Supplier Sustainability Manual, which provides extensive detail on expected supplier procurement practices and requires supplier acknowledgment.

METALS SUPPLIERS

Nearly all Southwire metal suppliers belong to the International Council on Mining & Metals (ICMM). The ICMM encourages stakeholder communication, including with the government, international organizations, local communities and others in the supply chain to ensure companies can meet all environmental and social regulations. We reinforce supplier ICMM guidance by including their ten principles in our Global Supplier Sustainability Manual. We also require that our suppliers adhere to the ten principles of the UN Global Compact. The UN principles establish a culture of integrity and assist companies in keeping obligations to the people they employ and work with and to the environment.

As an additional layer to strategic sourcing, we also require supplier compliance with all Southwire [Conflict Minerals](#) Policy guidelines.

SUSTAINABLE SUPPLY CHAIN & PROCUREMENT

SUPPLIER DIVERSITY

We believe that Diversity, Equity and Inclusion (DEI) is invaluable to sustaining our business. Our Strategic Sourcing group helps ensure the longevity of Southwire by building and maintaining a robust and resilient supply chain that includes diverse businesses, including those owned and operated by women, veterans and minorities.

Southwire's Supplier Diversity Program continues to advance efforts to embed diversity into our supply chain by working to identify and engage diverse businesses in sourcing events. We also seek opportunities to foster and develop supplier relationships through our participation in regional business seminars organized by our utility customers and by attending business conferences and local events to identify and recruit qualified small and diverse businesses. Further supporting supplier diversity, we are an active corporate member of the [National Minority Supplier Diversity Council \(NMSDC\)](#) and the [Women's Business Enterprise National Council \(WBENC\)](#).

To track, monitor, inform and help support the supplier diversity goals of our business partners, we report monthly supplier diversity expenditures to our top utility customers. In addition, our public [DEI website](#) reports supplier diversity metrics to increase the disclosure transparency of our quarterly diversity results and growing partnerships.

Our overall spending with small and diverse businesses has risen by 60% in the last five years, reaching \$523 million. In 2021, Southwire added 137 small or diverse firms to its list of authorized diverse suppliers, accounting for 35% of Southwire's total supplier pool.

HUMAN RIGHTS POLICIES

Our commitment to supporting fundamental human rights, including dignity, freedom, equality, justice and peace, is foundational to Southwire and evident in all aspects of our business, from how we treat our employees to how we source our materials. We expect our suppliers, contractors and associates to uphold the human rights of all individuals, and we maintain a zero-tolerance policy for human trafficking, forced labor and child labor.

We define our obligation to protect human rights in our [Human Rights and Prevention of Human Trafficking Policy](#), and we are constantly working to improve practices throughout our operations. Our suppliers and business partners are bound to policy terms with contracts and written certifications to help ensure compliance. In addition, we conduct risk-based due diligence and monitor for "red flags" and misconduct, and we provide periodic training on the policy.

PERFORMANCE

Our on-site Supplier Sustainability audit program allows Southwire to proactively manage any potential negative supply chain impacts from our 30 largest, multinational suppliers, which represent 80% of our raw material spend (excluding metals). The audit measures Quality, On-time Delivery, Cost Containment and Customer Satisfaction for these 30 critical suppliers using biannual Supplier Scorecards.

Since establishing the program in 2015, we have identified no adverse supplier social or environmental impact incidents during audits, and we have not assigned any actions for improvement. Please see the [GRI index](#) in this report to view our Supplier Diversity metrics.



BUILDING WORTH

Addressing climate change is not only an environmental and humanitarian issue, but it is also a business issue. Companies like Southwire must evaluate the financial implications, risks and business opportunities associated with climate change and the transition to a zero-carbon economy. Our business must also become more resilient to the effects of potential long-term and extreme weather events on our operations, our supply chain and our customers. Therefore, Southwire is focused on investing in tools and processes that will help us assess and successfully transition to a zero-carbon economy.



CLIMATE CHANGE & ZERO CARBON TRANSITION



APPROACH

In 2021, as a result of our materiality assessment, we broadened our Climate Change & Zero Carbon Transition topic definition to include transitional risks and opportunities from climate change mitigation and adaptation. Due to its importance to Southwire stakeholders, we are also establishing robust governance structures to help ensure that we address the risks and opportunities linked to climate change and the low-carbon economy transition. Southwire's EVP, General Counsel and Chief Sustainability Officer, as well as our President of Wire & Cable and Chief Operating Officer, are responsible for the oversight of our climate change strategy. Additionally, we report all climate risk management plans and opportunities to the Board Sustainability Committee.

ADDRESSING CLIMATE RISKS

To maintain our leadership status in the wire and cable manufacturing industry and help drive the clean energy transition, we must address both the risks and opportunities of climate change—now and in the coming decades. Identified risks to Southwire include impacts to our supply chain and operations. We also recognize that climate change raises the risk of more severe and frequent extreme weather events. Impacts associated with these events, such as floods and winter storms, are a concern for some of our manufacturing locations. Production downtime; materials damage and associated clean-up costs; impacts on product demand; and employee absences are among the associated risks of extreme weather. In response to identified risks, we created a flood emergency response plan (FERP) and winterization procedures. We also implemented administrative and infrastructure improvements that are helping us prepare for and mitigate potential future climate-related occurrences.

Southwire is working to integrate a climate change scenario analysis into our Enterprise Risk Management process. Integration will allow us to identify, prepare for and respond to possible climate-related risks across our business. We intend for the analysis to be in alignment with the Task Force on Climate-Related Financial Disclosures (TCFD). The goal is to finalize this integration by 2024. Our risk management and sustainability teams are also collaborating to establish an internal employee-based working group with senior, executive and board oversight to help lead and manage the process. As we continue to monitor the effects of climate change, we will adapt our plans and strategies as needed.

ADDITIONAL OPPORTUNITIES

Additional climate change opportunities include strengthening Southwire's financial and environmental sustainability by expanding and leveraging our services and product offerings to help facilitate the global transition to a clean energy economy. To do this, we dedicate ourselves to assisting our customers in navigating their climate risks and sustainability objectives. We are also developing new solutions to help customers reduce their carbon impact and adjust to a changing climate. To diversify our own business and minimize potential climate impacts, we are exploring opportunities to grow our operations into adjacent markets. In addition, to create resilient solutions, we are broadening efforts beyond our core electrical cable and wire products manufacturing to become a leader in providing diversified electrical goods and services. For example, in 2021, we acquired Topaz Lighting and OBI Partners. These acquisitions allow Southwire to expand into the lighting and software-as-a-service (SaaS) provider space, with a focus on electric utilities.

As we continue to assess our risks and opportunities and expand our capabilities and offerings, we are well-positioned to help drive the clean energy transition as an industry leader.

CLIMATE CHANGE & ZERO CARBON TRANSITION

SOUTHWIRE CLIMATE AND LOW-CARBON TRANSITION SOLUTIONS

INDUSTRIAL: MASS TRANSIT AND EV

The transition to a low-carbon economy demands environmentally friendly transportation infrastructure with enhanced safety measures.

- Low Smoke Zero Halogen (LSZH) products reduce public health and safety risks by addressing the danger of smoke and toxic gas in mass transit tunnels. As a result, LSZH products are in demand for projects with limited ventilation and high numbers of people.
- Products including thermoplastic high-heat-resistant nylon (THHN), cable-in-conduit (CIC) and EV charging cables are in demand as electrified transportation infrastructure grows.

UTILITY: STRATEGIC UNDERGROUNDING AND GRID HARDENING

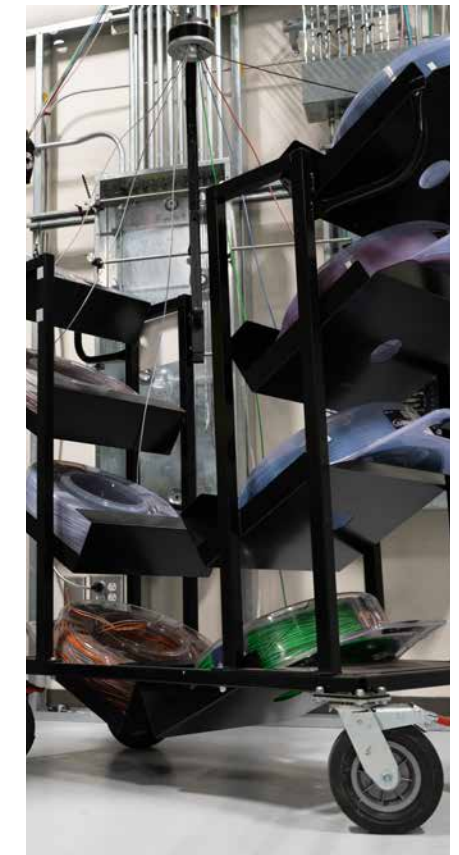
Widespread outages caused by natural disasters drive the need to improve grid resiliency, including converting systems to underground networks.

- CIC solutions improve jobsite safety and efficiency and help to shorten outage duration; accelerate repair efforts; extend system performance and life expectancy; and reduce cable replacement frequencies.
- Tree Wire, used in tree-crowded areas such as residential areas prone to significant weather events, prevents direct shorts and instantaneous flashovers in case of sudden contact with tree limbs, as well as reducing the space and hardware required for line installation.

INFRASTRUCTURE: *COILPAK™* AND *SIMPULL™* BARREL

As the world faces growing labor shortages and a need for more efficient wire installation methods, Southwire products maximize efficiency and worker safety during the installation process.

- SIMpull® CoilPAK™ payoff increases safety and improves efficiency by reducing physical handling, set up, and wire pulling.
- CoilPAK™ with SIMpull® THHN wire is a space-saving, efficiency-adding design utilizing a multi-wire solution that reduces pulling tensions.
- SIMpull™ Barrel increases use options through compatibility with various products including SIMpull NoLube Wire products and Metal Clad (MC) Cables, allowing longer lengths to be used. Products also increase productivity and safety by reducing material handling.



PERFORMANCE

Despite supply chain disruptions, such as shipping backlogs, delays caused by the ongoing COVID-19 pandemic and increasing inflation, Southwire successfully continued operations by leveraging relationships with our suppliers and adjusting quotas to acquire necessary materials. We continued to progress on our 2025 goal of generating \$1 billion in revenue from products and solutions with sustainable attributes by earning approximately \$550 million in incremental revenue in 2021. In addition, Southwire R&D continues to demonstrate our commitment to investing in the advancement of sustainable products which contribute to sustainable product revenue. In 2021, approximately 58% of R&D efforts were focused on products with sustainable attributes while 61% of R&D spend included products with sustainable features.

CUSTOMER EXPERIENCE



Customer care is essential to strengthening our brand and advancing our reputation. At Southwire, our number one customer priority is ensuring customer satisfaction. We do this by listening to and observing our customers in an effort to understand their needs, developing a value proposition reflecting unique customer groups and providing responsive customer service. We also educate our customers, contractors and end-users on the safe and effective use of Southwire products. By caring for our customers through engagement, we can help to ensure greater satisfaction with products and services and build enduring relationships.

APPROACH

Managing and improving the customer experience requires an “all in” effort that enhances engagement at each touchpoint. We measure customer satisfaction through surveys that quantify loyalty and quality of service. Survey reviews also help Southwire continuously improve our overall customer experience strategy by helping us understand what matters most to our customers. By closely managing and improving the customer experience, we can proactively address evolving customer needs and compete in a crowded market.

ONLINE CUSTOMER EXPERIENCE

Over the past few years, consistent feedback from customers includes an increased desire for a “great online user experience.” Customers increasingly turn to e-commerce sites for their purchasing needs. Partially driven by the pandemic, customers now expect online purchasing options with real-time shipment tracking features. This shift to e-commerce is driving demand away from traditional customer service models.

We continuously work to enhance our online ordering portal so that customers can effortlessly access and update order details. As a result, Southwire was named a *top online vendor by Lowes'* internal supplier community in 2021, successfully demonstrating the success of the company's efforts to improve our online services.

ACCOUNTABILITY

To provide accountability, we report data-driven survey insights on a quarterly basis to the commercial wire & cable team, led by the President of Wire & Cable and Chief Operating Officer, and develop plans addressing opportunities and matters that require corrective action. Our Vice President of Customer Service & Specialty Distribution oversees the Southwire customer experience strategy. Each of our inside sales department heads also leads efforts to improve the customer experience for their respective business units. Additionally, monthly CEO staff meetings frequently discuss and evaluate customer experience efforts.

PERFORMANCE

To understand the success of our customer experience efforts, we measure two key performance indicators (KPIs): Ease of Doing Business and Net Promoter Score (NPS). Our Doing Business rating measures how easy it is to work with Southwire, and our NPS measures customer experience and helps predict business growth. In 2021, we evaluated over 1,200 customers to understand how they rate us on these two KPIs and analyzed more than 450 survey comments received as part of feedback to identify themes and opportunities that can help us improve our survey assessment process.

PRODUCT QUALITY & SAFETY

We are committed to providing the highest quality products and services to our customers, and we dedicate ourselves to the well-being of our customers and end-users. To follow through on our commitment and dedication, we scrutinize product designs, installation processes and user information to enhance productivity and manufacture safe products. In addition, our quality standards help us to mitigate the risk of product and service recalls or warranty claims, which could result in financial consequences to Southwire.

APPROACH

The Southwire quality team for wire and cable oversees our strategic approach to maintaining high product quality. The approach assesses both quality and safety systems in an effort to identify product improvement opportunities. In addition, the quality team utilizes several quality assurance tools, including Failure Mode and Effects Analysis (FMEA), Control Plans, Pilot Runs and Quality Assurance Tests, to provide the best product to customers. The TCAS quality team conducts product quality and safety due diligence before completing acquisition transactions and executes an established integration plan to help ensure the acquired business complies with our quality policies and expectations. For all products, we assure customers through warranties and proactively inform them in the unlikely event of a product recall.

ORGANIZATIONAL CAPABILITY

In 2021, strengthening organizational capability was a product quality priority. We continued to enhance existing systems and invested in new tools to monitor and improve product quality and safety. In addition, wire and cable implemented a Quality Training Matrix to help quality-focused leadership positions at manufacturing sites build critical competency skills in four areas: Quality Improvement Tools, Problem Solving Tools, Quality Management Systems and Statistical and Lean/Six Sigma tools.

Additionally, we launched an initial wave of Southwire Quality and Process Improvement (SQPI) training targeting process variations using the Six Sigma DMAIC (Define, Measure, Analyze, Improve, Control) methodology. Helping to further embed foundational quality skills across Southwire, SQPI and Quality Training Matrix deployment will continue in 2022.

TCAS continues to integrate new acquisitions into Southwire's existing quality management processes and gather data to further standardize product quality across all sites. In 2021, the quality team conducted a process review and updated four cornerstone processes:

- Pre-Shipment Inspection (PSI): Defines the management and inspection of Southwire products at the supplier prior to shipment.
- Quality Systems Audit (QSA): Defines audit procedures and frequency for our suppliers' quality systems.
- Responsible Sourcing Audit (RSCA): Defines audit procedures and frequency for our suppliers' compliance with the law and Southwire policies around labor and ethics.
- Customer Complaint Process: Moved our management system to SAP for better linking to financials and reporting and utilizes the existing Quality Notification process from Wire & Cable.

PERFORMANCE

Southwire conducts periodic audits of our facilities and operations to understand process improvement opportunities. In 2021, TCAS completed an internal standard procedures audit to develop a baseline for future improvements. The wire and cable business also implemented a Quality Health Scorecard to measure the strength of each site's Quality Management System based on the 10 Quality Systems policies. The introduction of the scorecard audit provides each plant with an assessment of quality system opportunities at each site. The Health Scorecard launch was so successful in helping to identify product quality and safety initiatives that we anticipate it will remain a significant measure of improvement in coming years.

We are also proud to report that, after successfully implementing our new product quality and safety initiatives, our Quality Health Scorecard was given a 3.1—on a scale of 5—by our internal quality professionals. Our score exceeds the internal target of at least 3.0 points within the first year of implementation. Additionally, our wire and cable manufacturing group reached a 60% completion of the Quality Training Matrix at year-end.

As a result of our efforts, we saw a decrease in quality-related returns to 0.89% in 2021, as compared to 1.9% in 2020 and 2.1% in 2019. We attribute these changes to process improvements. Additionally, there was an increase in non-conforming parts per million (NPPM) in 2021. As we become more granular with our quality audits, we identify more NPPM and prevent them from reaching our customers, which contributes to reduced quality-related returns.

To continue improving quality performance, the wire and cable team will continue to expand the use of the Quality Health Scorecard and develop plans for improvement based on the results. In addition, TCAS is developing site-specific baselines for future monitoring and reporting, as well as standardizing its data collection and reporting process to improve transparency. In 2021, TCAS released a Supplier Quality Handbook and a Packaging Requirements document to increase supplier understanding of TCAS requirements.

ABOUT THIS REPORT

Southwire's 2021 Sustainability Report describes our environmental, social and governance priorities and commitments in five key areas:



STAKEHOLDER ENGAGEMENT

At Southwire, we believe active engagement with stakeholders is essential to our success—it helps us build strong, mutual relationships that inform our sustainability practices, policies, and priorities. We identify stakeholders through interviews with executive leadership, the Sustainability Committee of the Southwire Board of Directors and various other employees. We select stakeholders for engagement based on their knowledge and understanding of Southwire's overall operations, industry positions, regulatory history and community involvement.

We regularly engage our stakeholders through both formal and informal processes that allow us to identify and proactively address emerging sustainability needs, risks and opportunities. Our stakeholder groups include customers, suppliers, shareholders and board members, regulators, industry associations, non-governmental organizations, community members and employees. Stakeholder engagement centers on employee involvement and membership in industry organizations and associations as well as various civic, environmental, health and safety organizations across our geographic footprint. Other key external stakeholder engagement opportunities include interactions with customers, suppliers and community members. For a complete list of stakeholder groups and engagements, please see the [GRI Index](#).

To continue to evolve our sustainability efforts, we engaged an independent third-party advisor to update our ESG materiality assessment in 2021. Adhering to requirements of GRI, the assessment process identified, mapped and prioritized ESG issues, risks and opportunities in terms of importance to Southwire's business and to our stakeholders. The process included the following actions:

Identifying topics	Engaging stakeholders	Prioritizing results
<ul style="list-style-type: none"> Evaluated 27 potential ESG topics Secured topic input from key internal and external stakeholders Analyzed industry, market and regulatory data Conducted thorough review of emerging trends Performed benchmarking and research against <ul style="list-style-type: none"> - 25 peers - 5 suppliers - 10 customers - 2 industry groups 	<ul style="list-style-type: none"> Engaged with Southwire internal SMEs to fine-tune topics list and identify possible impacts, risks and opportunities across Southwire's value chain Interviewed stakeholders via questionnaire and validated results 	<ul style="list-style-type: none"> Assigned each topic a value based on importance to Southwire's business and stakeholders to identify the highest priority ESG topics Reviewed highest priority topics to understand ESG reporting priorities and affirmed alignment Results revealed 13 priority Tier 1 topics in four of our five tenets Changes in material topics from 2018 include <ul style="list-style-type: none"> - Seven topics expanded, combined or refocused - Three topics removed - Four topics added

This 2021 Sustainability Report focuses on Southwire's ESG commitments and practices covering all company operations and locations in calendar year 2021, unless otherwise noted. This report is prepared in accordance with GRI Standards: Core option. In some cases, data and information in this report related to our priority areas may include programs and activities underway prior to our most recent reporting year. We published our previous sustainability report in July 2021, and we share our sustainability progress annually in our GRI report.

In 2021, Southwire is restating previously reported Scope 1 and 2 GHG emissions for 2020, which were updated based on an internal review of energy usage information and revised applicable emission factors. Most notably, Scope 2 GHG emissions were updated to reflect the eGRID factors for 2020 published by US EPA in January 2022.

Report content is assured through an internal review process, including executive oversight and subject matter reviews and validation. A third-party consultant calculates and verifies the accuracy of our Scope 1, 2 and 3 emissions data using the GHG Protocol Corporate Accounting and Reporting Standard.

We welcome feedback and questions about this report. Please direct inquiries regarding our sustainability disclosures, efforts and commitments to sustainability@southwire.com.

GENERAL DISCLOSURES

DISCLOSURE	DESCRIPTION	RESPONSE
ORGANIZATIONAL PROFILE		
102-1	Name of organization	About Southwire
102-2	Activities, brands, products and services	About Southwire
102-3	Location of headquarters	About Southwire
102-4	Location of operations	About Southwire
102-5	Ownership and legal form	About Southwire
102-6	Markets served	<p>Our primary vertical markets include:</p> <ul style="list-style-type: none"> • Renewables • Transmission • Power Distribution • Residential • Hospitals and Healthcare • Refining/Petrochem • Commercial/Institutions • Transportation • Data Centers • Factory Automation <p>A strong, integrated support function backs the company’s business groups, allowing Southwire to sell across product lines more effectively and maximize the value the company brings to our customers. To support the success of these business groups, Southwire is investing in technologies to maintain and govern best business practices for marketing assets in supporting product management. These technologies allow us to be more efficient and make it easier for customers to do business with us. This is a scalable and sustainable method to support future growth.</p>

DISCLOSURE

DESCRIPTION

RESPONSE

102-7

Scale of organization

[About Southwire](#)

To maintain the confidentiality afforded to a private company, Southwire chooses not to publicly report total capitalization.

102-8

Information on employees and other workers

[About Southwire](#)

EMPLOYEES BY REGION BREAKDOWN

2021 Employees	Employment Contract Permanent * †	Employment Type Full Time	Employment Type Part-Time
Region	United States	6897	
	Honduras	373	
	Mexico	43	(Not required)
	Canada	105	
	China	50	
	Netherlands	1	
2021 Total	7,469	6,608	289

*An employee hired to work without a specific time frame for exit

†In 2021, Southwire did not directly employ any temporary employees

102-9

Supply Chain

As one of North America’s largest wire and cable producers, vertical integration of our supply chain limits complexity and helps us maintain a stable and steady source of inputs for our operations. Additionally, this enables Southwire to apply our sustainable business practices directly to processes that might otherwise fall outside our sphere of immediate influence.

Southwire relies on three main groups for a strong, adaptable supply chain: raw materials providers, logistics partners and contractors. The primary raw materials we source include metals, such as copper and aluminum, and a wide array of compounds, chemical additives and fillers used to insulate, jacket and construct our wire and cable products. Southwire sources most of these materials from suppliers that mine or manufacture basic feedstocks (e.g., copper cathode or PVC resin) for Southwire’s downstream conversion into raw materials such as copper rod and PVC compounds.

102-10

Significant changes to the organization and its supply chain

In 2021, we had the following organizational changes: acquired Topaz Lighting Corporation (Topaz) and OBI Partners; there were no divestitures of operations; and there were no closures of offices or operations. In December, we announced the planned Q1 2022 closures of our facilities in Duluth, Ga., Cambridge, Ont., and Putten. Netherlands.

DISCLOSURE	DESCRIPTION	RESPONSE
102-11	Precautionary principle or approach	While Southwire does not formally address the precautionary principle, we assess environmental and safety risks related to our operations.
102-12	External initiatives	<p>About this Report</p> <p>Southwire strongly supports and participates in industry associations that champion our key customers' needs. Our engineers and leaders work to maintain and create our industry partnerships. As we engage our customers and other industry interest groups through these associations, we request feedback on our products' performance and identify needs or gaps around products or services that may or may not exist.</p> <p>We proudly participate in the following organizations:</p> <ul style="list-style-type: none"> • 100+ Women Strong, Auburn University • Aluminum Association • ABB Industry Expert Day • Alliance for Telecommunications Industry Solutions (ATIS) • American Copper Council • American National Standards Institute (ANSI) • Association of Builders & Contractors (ABC) • The Association of Edison Illuminating Companies (AEIC) • ASTM International • Canadian Standards Association • Colombian Institute of Technical Standards and Certification (ICONTEC) • Continental Automated Buildings Association (CABA) • Copper Club • Copper Development Association • Council for Harmonization of Electrotechnical Standardization of the Nations of the Americas (CANENA) • Electrical Manufacturers' Club • Electrical Training Alliance (ETA) (previously called NJATC) • Electro Federation Canada • EMerge Alliance • Engineering Young Alumni Council, Auburn University • Independent Electrical Contractors (IEC) • Institute of Electrical and Electronics Engineers (IEEE) • IEEE Dielectrics and Electrical Insulation Society (IEEE/DEIS) • IEEE Industry Applications Society (IEEE/IAS)
102-13	Memberships of associations	

DISCLOSURE

DESCRIPTION

RESPONSE

102-13

Memberships of associations

- IEEE Mexico
- IEEE Power and Energy Society (IEEE/PES)
- IEEE Standards Association (IEEE/SA)
- IEEE Wire Line Subcommittee
- Industry Data Exchange Association, Inc. (IDEA)
- Insulated Cable Engineers Association (ICEA)
- Insulated Conductors Committee (ICC)
- International Association of Electrical Inspectors (IAEI)
- International Cablemakers Federation
- International Council on Large Electric Systems (CIGRE)
- National Association of Manufacturers (NAM)
- National Association of Standardization Mexico (ANCE)
- National Electrical Contractors Association (NECA)
- National Electric Energy Testing Research and Applications Center (NEETRAC/Georgia Tech)
- National Electrical Manufacturers Association (NEMA)
- National Fire Protection Association (NFPA)
- North American Association of Utility Distributors (NAAUD)
- Northwest Public Power Association (NWPPA)
- Plastic Pipe Institute (PPI)
- Power Delivery Intelligence Initiative (pdi2)
- Rocky Mountain Electrical League (RMEL)
- Rockwell Automation’s Encompass Partner Program
- Smart Electric Power Alliance (SEPA)
- Society of Automotive Engineers (SAE) International
- Society of Cable Telecommunications Engineers (SCTE)
- Sustainability in Telecom: Energy and Protection (STEP)
- Technical Subcommittee on Specialized Wiring Systems – C231(ICCM06)
- Telcordia
- The Steven A. Denning Technology & Management (T&M) Program, Georgia Tech
- UL Latin America
- UL Standards Technical Panels (Various)
- U.S. Green Building Council
- Utility Power Cable Standards Technical Advisory Committee (UPCSTAC)
- Utility Purchasing Management Group (UPMG)
- Utility Supply Management Association (USMA)
- Wire Association International (WAI)
- Western Mining Electrical Association (WMEA)
- Women in Cybersecurity (WiCyS)

DISCLOSURE

DESCRIPTION

RESPONSE

- Women in Manufacturing Association (WiM)

STRATEGY

102-14

Statement from senior decision-maker

Southwire issued a leadership letter included above in connection with our 2021 Sustainability Report.

ETHICS AND INTEGRITY

102-16

Values, principles, standards and norms of behavior

We demonstrate our commitment to ethical business practices by publishing and providing all employees with an uncompromising ethics statement. Southwire's [Code of Business Conduct](#) outlines our mission, business philosophy, values and standards and implemented training on the same. In 2021, Southwire published its first [Supplier Code of Business Conduct](#) to ensure that both Southwire and its business associates live up to our Doing Right values.

See our [webpage](#) for more information on Ethics, Anti-Corruption & Transparency.

102-17

Mechanisms for advice and concern about ethics

Employees and stakeholders may report any ethics concerns or ask questions in-person, by phone or by email to a local supervisor or manager, human resources representatives or at Southwire's Ethics and Compliance Office. Additionally, individuals can make reports or ask questions using the company's Doing Right Helpline, which is run by an independent third-party and is available 24/7, 365 days a year. Employees and stakeholders may make reports to the Doing Right Helpline anonymously if desired, and they are able to make reports on a web portal ([doingrightconnection.com](#)), by phone or by text. Southwire thoroughly investigates all reports and other indications of potential ethics violations. We utilize a case management system for investigations, which allows us to track reports received and maintain analytics on the nature of the reports to improve investigatory actions and inform remediation and training protocols. For a company of our size, historically we have received few significant incidents or litigation.

See our [webpage](#) for more information on Ethics, Anti-Corruption & Transparency.

GOVERNANCE

102-18

Governance structure

As a family-owned company, our shareholders consider potential reputational risk for themselves and their families. Southwire's leadership team is committed to maintaining the highest level of financial and business integrity. Strong governance ensures accountability and good management practices across the organization. Clear communication up and down the organization supports Southwire's robust governance structure.

Southwire works to align our governance structure with the regulations typically imposed on publicly-owned companies, incorporating a majority of independent directors on the board and requiring financial accountability. We strive to implement this model while continuing to benefit from the flexibility, confidentiality and long-term investment perspective that comes with private ownership.

DISCLOSURE

DESCRIPTION

RESPONSE

Based on our commitment to strong governance, our board includes 12 members: three are shareholders, one represents top management and eight—a majority—serve as independent directors elected to the board by the company’s shareholders. While Southwire is a family-owned company, we take pride in our independent leadership. Our management committees report directly to our independent board members and oversee sustainability, risk, governance, and ethics and compliance. Southwire’s governance structure promotes ethical and accountable decision-making that holistically considers the effects of Southwire’s business on all stakeholders.

Below we outline Southwire’s Board and Executive committees that drive sustainability throughout our operations and beyond.

BOARD COMMITTEES

Human Resources Committee (Independent)

To maintain the highest quality human resources policy, practices and initiatives throughout Southwire, the company has a Human Resources (HR) Committee comprised of at least three members elected by the board of directors. The committee, which meets at least four times annually, oversees the succession and development plans for executive and senior leadership, reviews the compensation philosophy, policies, practices and benefits for executives and employees to confirm they reflect diversity and inclusion and remain equitable, competitive and consistent with the company’s philosophy. Another key aspect of the committee’s responsibilities includes managing the culture and engagement policies that affect the whole company to ensure that Southwire is a respected employer of choice and an industry leader. Our [Human Resources Committee Charter](#) is available for further review.

Sustainability Committee (Independent)

Southwire’s independent Sustainability Committee regularly reviews our sustainability practices and provides guidance as needed. The committee oversees broad areas of decision making affecting the company’s overall sustainability including environmental affairs, customer and employee health and safety, ethics and compliance program, new and innovative technologies, sustainable goal setting and adequate resource dedication to sustainability related initiatives. More information on the committee’s responsibilities can be found in our [Sustainability Committee Charter](#).

Audit Committee (Independent)

The Audit Committee meets regularly to help the board provide oversight of the quality and integrity of the company’s financial statements, reporting practices and accounting policies, and reviews ethics and compliance investigations. The committee also provides counsel to the board and management on matters, events, policies and decisions having a material financial impact on the company and shareholders. The policies the committee enacts for the board ensure regulatory compliance of reporting practices and accounting. To achieve high-quality policies and reports, an open dialogue between the committee and management allows sufficient insight and information to provide advice and counsel to the management and board. To learn more, please view our [Audit Committee Charter](#).

Governance Committee (Independent)

The purpose of the Governance Committee is to review and make recommendations to the board on matters concerning corporate governance, board composition, identification, evaluation and nomination of director candidates, and composition of board committees. The committee also assists in its review of board performance and identifies and reports any conflicts of interest to the board. Our [Governance Committee Charter](#) is available for review.

102-18

Governance structure

DISCLOSURE

DESCRIPTION

RESPONSE

102-18	Governance structure	<p>Executive Committee The Executive Committee is a standing committee that often acts as a steering committee for the full board when the full board is not able to convene, such as between regularly scheduled meetings. Functioning as a steering committee, the Executive Committee prioritizes issues for the full board to address. The Executive Committee’s responsibilities include, but are not limited to, providing organizational direction and acting on behalf of the board, providing organizational oversight, managing high-level workplace issues of a serious nature, facilitating board communication and development. The committee is comprised of the chairman of the board, the lead director and the president and chief executive officer.</p> <p>MANAGEMENT COMMITTEES</p> <p>Risk Oversight Committee Our Risk Oversight Committee, with three executive sponsors, brings together 10-15 individuals from different functions across the company to look at risk from various perspectives. The committee meets quarterly, and information flows both up to and down from the board. Southwire forms task forces to address the greatest identified risks, such as cybersecurity, resource scarcity and product liability, including third-party loss.</p> <p>For more information on Southwire’s governance structure, see our webpage.</p> <p>COMMUNICATING WITH THE BOARD</p> <p>Southwire’s working teams are generally issue-specific and established as needed. The teams meet regularly and report their progress through regular updates from the executive leader of sustainability to the board. Southwire’s executive leader of sustainability provides at least quarterly updates to the board’s Sustainability Committee and our full board of directors regarding initiatives.</p> <p>AUDITS</p> <p>External audits help to ensure business accountability. Southwire has a goal to assure the accuracy and integrity of financial, environmental and safety management systems by completing annual third-party financial audits every year and environmental, health and safety audits every two to three years. An external auditor reviews Southwire’s financial statements to provide an accurate, unbiased report of the company’s financial condition, helping to ensure integrity in our fiscal reporting. Because Southwire is privately owned, our financial statements are not publicly available. However, the board reviews the company’s financial performance carefully, with a close eye on profitability, strategy and business ethics.</p>
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STAKEHOLDER ENGAGEMENT

102-40	List of stakeholder groups	Stakeholder Engagement
102-41	Collective bargaining agreements	Southwire provides a desirable workplace for our employees with fair compensation and a well-developed company culture based on a “family feel.” The majority of Southwire’s employees are full-time, hourly workers. With positive employee relations, collective bargaining agreements covered approximately 2% of our full-time employees in 2021, which includes those employees located at our Waukegan, Illinois, manufacturing operations.

DISCLOSURE

DESCRIPTION

RESPONSE

102-42

Identifying and selecting stakeholders

[Stakeholder Engagement](#)

INTERNAL STAKEHOLDERS

Stakeholder engagement—a business imperative for Southwire—occurs in many ways. We invest in numerous mechanisms to engage our employees.

Approach	Frequency	Topics & Concerns Raised
Employee Engagement Survey	Annually	<ul style="list-style-type: none"> Employee Engagement & Retention Ethics, Anti-Corruption & Transparency Financial Performance Diversity, Equity & Inclusion Workplace Safety & Employee Well-Being
Roundtable Discussions	Monthly	<ul style="list-style-type: none"> Financial Performance Operations Topics Product Quality & Safety Diversity, Equity & Inclusion
Town Hall Meetings	Quarterly	<ul style="list-style-type: none"> Financial Performance Business Plans Market Conditions Product Quality & Safety Diversity, Equity & Inclusion Expansion/Reduction of Operations
Lean	Ongoing	<ul style="list-style-type: none"> Operations Topics Product Quality & Safety
Ethics Hotline	24 hours a day, seven days a week	<ul style="list-style-type: none"> Ethics, Anti-Corruption & Transparency Legal and Policy Compliance EHS Product Quality & Safety
Just Ask	24 hours a day, Seven days a week	<ul style="list-style-type: none"> Ethics, Anti-Corruption & Transparency EHS Employee Engagement & Retention

102-43

Approach to stakeholder engagement

EXTERNAL STAKEHOLDERS

Southwire’s external stakeholder engagement centers on employee involvement and membership in industry organizations and associations as well as various civic, environmental, health and safety organizations across our geographic footprint. Other key external stakeholder engagement opportunities include interactions with customers, suppliers and community members.

102-43

Approach to stakeholder engagement

Stakeholder Group	Approach & Frequency	Topics & Concerns Raised
Customers	Ongoing: <ul style="list-style-type: none"> Voice of the Customer survey Satisfaction surveys User forums Trade shows Scorecard reviews Site visits Customer Support Center hotline As needed: <ul style="list-style-type: none"> Materiality assessment 	<ul style="list-style-type: none"> Product Quality & Safety Ethics, Anti-Corruption & Transparency Customer Experience Materials, Recycling & Circular Economy Energy & GHG Emissions
Suppliers	Ongoing: <ul style="list-style-type: none"> Sustainability surveys On-site audits Meetings As needed: <ul style="list-style-type: none"> Materiality assessment 	<ul style="list-style-type: none"> Workplace Safety & Employee Well-Being Financial Performance Ethics, Anti-Corruption & Transparency Sustainable Supply Chain & Procurement Practices Water & Wastewater Energy & GHG Emissions Materials, Recycling & Circular Economy
Shareholders & Board Members	Quarterly and as needed: <ul style="list-style-type: none"> Board meetings As needed: <ul style="list-style-type: none"> Materiality assessment 	<ul style="list-style-type: none"> Water & Wastewater Energy & GHG Emissions Workplace Safety & Employee Well-Being Product Quality & Safety Financial Performance Ethics, Anti-Corruption & Transparency Employee Engagement & Retention
Regulators	Ongoing: <ul style="list-style-type: none"> Pre-application meetings Progress updates Voluntary program audits 	<ul style="list-style-type: none"> Workplace Safety & Employee Well-Being Water & Wastewater Energy & GHG Emissions Operational Waste

DISCLOSURE	DESCRIPTION	RESPONSE
102-44	Approach to stakeholder engagement	Stakeholder Engagement See internal and external stakeholder table in 102-43 above.
REPORTING PRACTICES		
102-45	Entities included in the consolidated financial statements	As a private company, Southwire does not publicly disclose our financial statements, nor the entities within our operational control.
102-46	Defining report content and topic boundaries	About this Report ; Stakeholder Engagement
102-47	List of material topics	<ul style="list-style-type: none"> • Energy & GHG Emissions • Materials, Recycling & Circular Economy • Water & Wastewater • Cybersecurity & Data Privacy • Ethics, Anti-Corruption & Transparency • Sustainable Supply Chain & Procurement • Diversity, Equity & Inclusion <ul style="list-style-type: none"> • Employee Engagement & Retention • Talent Attraction • Workplace Safety & Employee Wellbeing • Climate Change & Zero Carbon Transition • Customer Experience • Product Quality & Safety
102-48	Restatements of information	About this Report - Reporting Practices
102-49	Changes in reporting	There are no changes in reporting.
102-50	Reporting period	About this Report - Reporting Practices
102-51	Date of most recent report	About this Report - Reporting Practices
102-52	Reporting cycle	About this Report - Reporting Practices

DISCLOSURE	DESCRIPTION	RESPONSE
102-53	Contact point for questions regarding the report	About this Report - Reporting Practices
102-54	Claims of reporting in accordance with the GRI Standards	About this Report - Reporting Practices
102-55	GRI content index	This report serves as Southwire's GRI Content Index.
102-56	External assurance	About this Report - Reporting Practices

TOPIC SPECIFIC

STANDARD

DISCLOSURE

RESPONSE & OMISSION

ECONOMIC TOPICS

ECONOMIC PERFORMANCE

**GRI 201:
ECONOMIC
PERFORMANCE 2016**

201-1
Direct economic value generated and distributed

Southwire is a privately held company that is not subject to Securities and Exchange Commission (SEC) financial statements filing and disclosure requirements. Financial information relating to the credit worthiness of the company is available through publicly available reports published by independent, nationally recognized ratings agencies. Upon request, additional information may be provided on a confidential basis.

The ultimate litmus test of financial performance is the preparation of U.S. GAAP-compliant annual audited financial statements. During this process, Southwire engages an international third-party auditor to review our annual financial records and performance.

A consortium of banks and other types of asset managers invest in Southwire through debt instruments. To provide a level of confidence for these investors, we share our financial statements and a business strategy overview with the rating agencies Moody's and Standard & Poor's. These agencies analyze our business prospects and provide investors with an objective third-party analysis of Southwire's credit worthiness.

OMISSION
Confidentiality constraints for 201-1: Direct economic value generated, economic value distributed and economic value retained. Southwire is a privately held company that is not subject to SEC financial statements filing and disclosure requirements. Financial information relating to the creditworthiness of the company is available through publicly available reports published by independent, nationally recognized ratings agencies. Additional information may be provided, upon request, on a confidential basis.

STANDARD

DISCLOSURE

RESPONSE & OMISSION

ENVIRONMENTAL TOPICS

MATERIALS

GRI 103: MANAGEMENT APPROACH 2016

103-1
Explanation of the material topic and its Boundary

[Growing Green: Materials, Recycling & Circular Economy – Approach](#)

Materials, Recycling & Circular Economy is a new material topic, previously named “Materials” in past reporting.

103-2
The management approach and its components

[Growing Green: Materials, Recycling & Circular Economy – Approach, Responsibilities](#)

103-3
Evaluation of the management approach

[Growing Green: Materials, Recycling & Circular Economy – Performance](#)

Metric	2016 Baseline*	2019	2020**	2021
Percent of Southwire communities with e-recycling programs	4%	39%	0%	4%

*Southwire’s “baseline” covers all Southwire communities except those associated with the DCN Cables, ProBuilt Professional Lighting, Garvin Industries, Madison Electric Products, Construction Electrical Products (CEP) and American Elite Molding (AEM) acquisitions.
 **Due to COVID-19, no recycling events were held in 2020, and the number of events was limited in 2021. In addition, Southwire has adjusted our target to establish e-recycling programs at all locations from 2021 to 2023 due to setbacks from COVID-19.

GRI 301: MATERIALS 2016

301-3
Reclaimed products and their packaging materials

RECYCLABLE WOODEN & STEEL REELS RETURNED*

	2019	2020	2021
	45,677	60,199	44,811

*Includes units recycled through our reel supply partner

STANDARD

DISCLOSURE

RESPONSE & OMISSION

RECYCLABLE REELS RETURNED (PERCENTAGE OF TOTAL WOODEN & STEEL REELS SHIPPED)*

		2019	2020	2021
GRI 301: MATERIALS 2016	301-3 Reclaimed products and their packaging materials	10%	8%	11.6%

*Includes shipments of both new and recycled reels

OMISSION

Information unavailable for 301-3: Southwire does not track the breakdown of our reclaimed products by category.

ENERGY

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	<p>Growing Green: Energy & GHG Emissions – Approach</p> <p>Energy & GHG Emissions is a new material topic, previously named “Energy & Air Emissions” and “Emissions” in past reporting.</p> <p>Southwire’s “baseline” reported energy use covers manufacturing plants, warehousing operations and offices, except those included in the DCN Cables, ProBuilt Professional Lighting, Garvin Industries, Madison Electric Products, Construction Electrical Products (CEP) and American Elite Molding (AEM) acquisitions.</p>
	103-2 The management approach and its components	<p>Growing Green: Energy & GHG Emissions – Approach, Responsibilities</p>
	103-3 Evaluation of the management approach	<p>Growing Green: Energy & GHG Emissions – Performance</p>

		2019	2020	2021	
GRI 302: ENERGY 2016	302-1 Energy Consumption within the organization	Total energy consumption (GJ)	3,755,999	3,873,798	3,929,988
		Total electricity consumption* (GJ)	1,820,409	1,851,012	1,836,438
		Total energy consumption from renewable sources (GJ)	461	4,176	32,661
		Total fuel consumption from renewable sources (GJ)	0	0	0

* Information obtained from utility bills, estimates used where data unavailable; Energy consumption calculated based on 1,020 Btu/cf natural gas (EPA AP-42 Section 1.4 for Natural Gas Combustion), 90,500 Btu/gal propane (EPA AP-42 Section 1.5 for Liquefied Petroleum Gas Combustion), 1,054.2 Joules/Btu, 3.6 MJ/KWh

STANDARD

DISCLOSURE

RESPONSE & OMISSION

WATER & EFFLUENTS

GRI 103: MANAGEMENT APPROACH 2018	103-1 Explanation of the material topic and its Boundary	Growing Green: Water & Wastewater – Approach Water & Wastewater is a new material topic, previously named “Water & Effluents” in past reporting.																			
	103-2 The management approach and its components	Growing Green: Water & Wastewater – Approach, Responsibilities																			
	103-3 Evaluation of the management approach	<p>Growing Green: Water & Wastewater – Performance</p> <table border="1"> <thead> <tr> <th></th> <th>2016 Baseline</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Water Use Intensity (gallons/ton)*</td> <td>298</td> <td>277</td> <td>285</td> <td>269</td> <td>281</td> </tr> </tbody> </table> <p>*2016 baseline values and 2018-2019 data were revised to reflect corrections to site production numbers following the implementation of SAP at all sites, which altered the intensity calculation</p>		2016 Baseline	2018	2019	2020	2021	Water Use Intensity (gallons/ton)*	298	277	285	269	281							
	2016 Baseline	2018	2019	2020	2021																
Water Use Intensity (gallons/ton)*	298	277	285	269	281																
GRI 303: WATER AND EFFLUENTS 2018	303-1 Interactions with water as a shared resource	Growing Green: Water & Wastewater – Approach																			
	303-2 Management of water discharge related impacts	Growing Green: Water & Wastewater – Approach Surface water was not a source of water for Southwire in the past three years.																			
	303-3 Water withdrawal	<p>TOTAL WATER WITHDRAWAL (ML) * †@</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Total Water Withdrawal (ML)</td> <td>898</td> <td>851</td> <td>894</td> </tr> <tr> <td>Well Water/Groundwater (ML)</td> <td>134</td> <td>131</td> <td>137</td> </tr> <tr> <td>Rainwater (ML)</td> <td>174</td> <td>107</td> <td>78</td> </tr> <tr> <td>Municipal (ML)</td> <td>589</td> <td>613</td> <td>679</td> </tr> </tbody> </table> <p>* We use a standard calculation methodology to determine evaporation rate [Evaporation Rate = Circulation Rate x Delta T / 1000]. Circulation rate is the recirculation pump’s rated capacity. Delta T is set at 5°F, a best estimate for the average temperature drop for our cooling towers over the course of a year. †The number of sites changed, therefore data is not consistent year over year.</p>		2019	2020	2021	Total Water Withdrawal (ML)	898	851	894	Well Water/Groundwater (ML)	134	131	137	Rainwater (ML)	174	107	78	Municipal (ML)	589	613
	2019	2020	2021																		
Total Water Withdrawal (ML)	898	851	894																		
Well Water/Groundwater (ML)	134	131	137																		
Rainwater (ML)	174	107	78																		
Municipal (ML)	589	613	679																		

STANDARD

DISCLOSURE

RESPONSE & OMISSION

**GRI 303:
WATER AND
EFFLUENTS 2018**

303-3
Water withdrawal

@Water usage is for all sites (not just 2016 baseline sites) except for mid-year acquisitions.

Southwire considers our operations in Tecate, Mexico; San Pedro Sula, Honduras; Rancho Cucamonga, California; Fontana, California; and El Paso, Texas to be in potentially water stressed regions.

TOTAL WATER WITHDRAWAL FROM WATER STRESSED AREAS, BY SOURCE (ML)

	2019	2020	2021
Total Water Withdrawal (ML)	62	63	71
Well Water/Groundwater (ML)	0	0	0
Rainwater (ML)	0	0	0
Municipal (ML)	62	63	71

OMISSION

Information unavailable for 303-3: Southwire does not track the breakdown of our total water withdrawal by category (freshwater and other water)

**GRI 303:
WATER AND
EFFLUENTS 2018**

303-4
Water discharge

We track water discharge by quality and destination for the two Southwire sites that require permits.

	Carrollton Copper Rod Mill	Kentucky Plant
Destination	Buffalo Creek	Ohio River
2021 total volume of planned water discharges (ML)	173	62
2021 total volume of unplanned water discharges (ML)	0	0
Treatment method	Chemical and physical treatment	Chemical and physical treatment
Quality of water	All discharge water quality met permit requirements	All discharge water quality met permit requirements
Water reused by another organization	None	None

While Southwire does not maintain a central inventory, we identify the receiving stream in the Notice of Intent for permit coverage at our sites that require NPDES permits, which allow Southwire to discharge to a specific water body.

STANDARD	DISCLOSURE	RESPONSE & OMISSION
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EMISSIONS		
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GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Emissions is not a material topic but relates to Growing Green: Energy & GHG Emissions
	103-2 The management approach and its components	Growing Green: Energy & GHG Emissions – Approach, Responsibilities
	103-3 Evaluation of the management approach	Growing Green: Energy & GHG Emissions – Performance

Southwire’s “baseline” reported GHG emissions covers all manufacturing plants, warehousing operations and offices with 25 employees or more, except those included in the DCN Cables, ProBuilt Professional Lighting, Garvin Industries, Madison Electric Products, Construction Electrical Products (CEP), Topaz, OBI Partners and American Elite Molding (AEM) acquisitions. Previously reported Scope 1 and 2 GHG emissions for 2020 were updated based on an internal review of energy usage information and revised applicable emission factors. Most notably, Scope 2 GHG emissions were updated to reflect the eGRID factors for 2020 published by US EPA in January 2022.

GRI 305: EMISSIONS 2016	305-1 Direct (Scope 1) GHG emissions					
			2018 Baseline	2019	2020	2021
		Gross Direct (Scope 1) GHG Emissions (metric tons of CO2e)*	106,055	103,370	100,034	106,062
*Southwire uses a subscription software solution to consolidate GHGs (CO2, CH4, N2O, HFCs, PFCs, SF6 and NF3) into CO2e. Global Warming Potential (GWP) values for natural gas, propane, etc. are based on the IPCC Fifth Assessment Report, 2014 (AR5). All sites are under operational control.						

	305-2 Indirect (Scope 2) GHG emissions					
			2018 Baseline	2019	2020	2021
		Energy Indirect (Scope 2) GHG Emissions (metric tons of CO2e)*	262,197	251,397	240,319	189,004
*Our subscription software consolidates GHGs (CO2, CH4, N2O, HFCs, PFCs, SF6 and NF3) into CO2e. Factors in the system are either based on U.S. EPA eGRID factors (electricity) or in-country equivalent or the best estimate for international sites; GWP values for natural gas, propane, etc. are based on the IPCC Fifth Assessment Report, 2014 (AR5). All sites are under operational control.						

STANDARD	DISCLOSURE	RESPONSE & OMISSION	2018 Baseline	2019	2020	2021
GRI 305: EMISSIONS 2016	305-4 GHG emissions intensity	GHG Emissions Intensity (Scope 1 & Scope 2) metric tons of CO2e/million pounds) ‡	204	202	204	178
‡Includes CO2, CH4, N2O, HFCs, PFCs, SF6 and NF3.						

WASTE

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Effluents & Waste is not a material topic but relates to Growing Green: Materials, Recycling & Circular Economy
	103-2 The management approach and its components	Growing Green: Materials, Recycling & Circular Economy – Approach, Responsibilities
	103-3 Evaluation of the management approach	Growing Green: Materials, Recycling & Circular Economy – Performance

	Waste Type (Tons)	2019	2020	2021	
GRI 306: EFFLUENTS AND WASTE 2016	306-2 Waste by type and management method	Other – Miscellaneous waste streams	309	0	0
		Other – Treatment	6,454	5,956	3,636
		Incineration (mass burn)	77	0	0
		Recovery (including energy recovery)	7,958	3,406	3,746
		Landfill	3,859	6,298	15,699
		Recycling	19,490	26,383	33,485
		Total	38,147	42,042	56,567

STANDARD

DISCLOSURE

RESPONSE & OMISSION

STANDARD	DISCLOSURE	RESPONSE & OMISSION	2021 Management Method (Tons)		
			Hazardous	Nonhazardous	
GRI 306: EFFLUENTS AND WASTE 2016	306-2 Waste by type and management method		Reuse	0	0
			Recycling	0	33,485
			Composting	0	0
			Recovery (including energy recovery)	28	3,718
			Incineration	0	0
			Deep well injection	0	0
			Landfill [†]	0	15,699
			On-site storage	0	0
			Other—Treatment	223	3,413
			Other—Miscellaneous waste streams	0	0
		Total	251	56,315	

*Southwire does not centrally track the amount of operational waste reused.

[†]Includes waste from soil remediation and construction debris not considered under “operational waste.” Southwire tracks waste management (recycle, treatment, waste-to-energy, etc.) through documentation on the shipping papers (manifest, bill of lading, etc.).

SUPPLIER ENVIRONMENTAL ASSESSMENT

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Doing Right: Sustainable Supply Chain & Procurement – Approach Sustainable Supply Chain & Procurement is a new material topic, previously named “Supplier Environmental Assessment” and “Supplier Social Assessment” in past reporting.
	103-2 The management approach and its components	Doing Right: Sustainable Supply Chain & Procurement – Approach

STANDARD

DISCLOSURE

RESPONSE & OMISSION

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-3
Evaluation of the management approach

Doing Right: Sustainable Supply Chain & Procurement – Performance

Supplier Diversity	2019	2020	2021
Spend With Diverse Suppliers (Millions Of Dollars)	\$375	\$341	\$523
Diverse Suppliers (Percentage Of Supplier Base)	20%	23%	35%

**GRI 308:
SUPPLIER ENVIRONMENTAL
ASSESSMENT 2016**

308-2
Negative environmental impacts in the supply chain and actions taken

The 30 suppliers in our Supplier Sustainability Program are large, multinational corporations with established supply chain programs. Through our audits of these suppliers, Southwire has not uncovered negative environmental or social impacts.

EMPLOYMENT

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-1
Explanation of the material topic and its Boundary

Living Well: Talent Attraction – Approach

Talent Attraction is a new material topic, previously named “Employment” in past reporting.

103-2
The management approach and its components

Living Well: Talent Attraction – Approach

103-3
Evaluation of the management approach

Living Well: Talent Attraction – Performance

**GRI 401:
EMPLOYMENT 2016**

401-1
New employee hires and employee turnover

		2019	2020	2021
New Employee Hires	Total	999	1,167	1,931
	Rate	13.5%	17.0%	26%
Employee Turnover	Total	1,426	1,426	1,736
	Rate	19.8%	17.8%	24.2%

OMISSION

Confidentiality constraints for 401-1 Hires and turnover by age group, gender and region.

STANDARD	DISCLOSURE	RESPONSE & OMISSION
OCCUPATIONAL HEALTH & SAFETY		
GRI 103: MANAGEMENT APPROACH 2018	103-1 Explanation of the material topic and its Boundary	Living Well: Workplace Safety & Employee Well-being – Approach Workplace Safety & Employee Well-Being is a new material topic, previously named “Occupational Health & Safety” in past reporting.
	103-2 The management approach and its components	Living Well: Workplace Safety & Employee Well-being – Approach
	103-3 Evaluation of the management approach	Living Well: Workplace Safety & Employee Well-being – Performance
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018	403-1 Occupational health and safety management systems	Living Well: Workplace Safety & Employee Well-being – Approach, OSHA Voluntary Protection Program
	403-2 Hazard identification, risk assessment and incident investigation	Living Well: Workplace Safety & Employee Well-being – Approach, Hazard Recognition & Risk Management
	403-3 Occupational health services	<p>MEDICAL FACILITIES</p> <p>Southwire provides occupational health services for each facility through a designated provider. On-site injury response varies depending on the location, and employee training ranges from basic first aid through providing first response care for medical emergencies. Additionally, Southwire provides employees with a resource focused on reducing musculoskeletal disorders, through Active Release Technique (ART) providers. We use this service as an early intervention tool for employee-reported discomfort. Our providers review and assess employee discomfort and offer recommendations on stretches and postures.</p> <p>We manage personal health-related information and occupational health services and records by following the Health Insurance Portability and Accountability Act (HIPAA) guidelines and recordkeeping standards. Southwire’s People & Culture department maintains this information. Southwire policies follow guidelines of the Equal Employment Opportunity Commission (EEOC) and the Americans with Disabilities Act (ADA) regarding health-related information.</p>
403-4 Worker participation, consultation and communication on occupational health and safety	<p>COLLABORATION WITH UNIONS</p> <p>Southwire operates one union-represented facility; Section 17 of the collective bargaining agreement covers safety and health. The agreement stipulates that the company will make reasonable provisions for the safety and health of our employees, such as requiring an employee from each shift to be trained in first aid response. Southwire will also furnish all personal protective equipment required by state and federal law and provide employees with a safety shoe allowance. The contract stipulates that Southwire management meet with the union safety committee monthly to correct any safety concerns. In addition, the agreement outlines that</p>	

STANDARD

DISCLOSURE

RESPONSE & OMISSION

**GRI 403:
OCCUPATIONAL HEALTH
AND SAFETY 2018**

403-4

Worker participation, consultation and communication on occupational health and safety

Southwire and the union mutually support participation in OSHA Voluntary Protection Program (VPP) and actively participate in all safety programs connected to VPP implementation.

EMPLOYEE ENGAGEMENT

Our front-line employees actively participate in our safety program through numerous employee engagement activities. Sites have employee-driven safety steering committees, which follow the OSHA VPP outline. Several manufacturing facilities and distribution centers are VPP Star certified. Our front-line supervisors actively participate in our safety program through supporting the numerous engagement activities and being the first point of contact for a safety concern. Supervisors ensure employees are empowered and given the time to participate in the employee safety steering committees. Front-line leaders assist with providing resources for identifying and controlling hazards through injury free event reporting, near miss reporting and other site-level initiatives. Supervisors help manage incident investigations, corrective actions and problem solving.

403-5

Worker training on occupational health and safety

TRAINING

With Southwire’s strategic learning focus on increasing organizational capability, a cross-functional team embarked on a journey to study the science of human performance and error reduction techniques. This team included members with roles in environmental, health and safety, quality and operations.

Safety and health training plays a key role in supporting and improving the safety and health culture within Southwire. As our operations continue to modernize, worker expectations change and technology transforms, we evolve our training initiatives and find new ways to engage our workforce in training.

We develop training using cross-functional teams including employees and third-party resources. Cross-functional teams help to ensure that training is effective and meets internal and regulatory requirements. Locations are moving beyond the standard classroom setting and are engaging in different training mediums such as computer-based-training, micro-training sessions and one-on-one activities. Our training protocols have classroom and hands-on activities where necessary. As a best practice, Southwire developed a New-to-the-Job and New-to-the-Task focus. The onboarding process now includes a minimum No-Touch Policy for these employees. This requires these designated employees to focus on observing and learning tasks, prior to even attempting hands-on training.

403-6

Promotion of worker health

ON-SITE SUPPORT

Research shows the importance of making health and wellness easy for employees by creating a health-oriented environment. To encourage employee and contractor health, Southwire maintains a Tobacco-Free Policy and provides tobacco cessation support for our employees and their family free of charge. All Southwire locations prohibit smoking and other use of tobacco on company property.

Southwire has continued to make an intentional effort to talk about and educate our employees on good mental health. Southwire creates ongoing communications through wellness videos and platforms that provide education and information on our employee assistance program (EAP) through our Optum network, highlights apps and tools that employees can utilize for mindfulness and online support, hosts virtual employee discussions around mental health and more. Southwire partners with Optum EAP to ensure employees have the resources they need for all things regarding wellness.

With our EAP program through Optum and our health care plan through Anthem, we have also brought more virtual behavioral health options to our employees including Talkspace, Sanvello, and Live Health Online. This has become a vital opportunity for accessing quicker mental care for our employees in tough life seasons.

403-7

Prevention and mitigation of occupational health and safety impacts directly linked by

[Living Well: Workplace Safety & Employee Well-being – Approach, Hazard Recognition & Risk Management](#)

The health and safety team deploys injury prevention strategies to reduce significant injuries and fatality potential. The key initiatives included, but are not limited to: vehicle-pedestrian interface reduction, loading dock safety, ergonomics, hand and finger injury potential and new to the job/new to the task risk reduction.

STANDARD

DISCLOSURE

RESPONSE & OMISSION

GRI 403:
OCCUPATIONAL HEALTH
AND SAFETY 2018

403-9
Work-related injuries

Employees	2019		2020		2021	
	No.	Rate	No.	Rate	No.	Rate
Employee fatalities*	0	0	0	0	0	0
High-consequence work-related injuries (excluding fatalities) – employees	11	0.13	18	0.23	11	0.13
Recordable work-related injuries (including fatalities) –employees	75	0.87	64	0.83	72	0.88
Main types of work-related injury – employees	Lacerations, Strains/Sprains, Contusions					
Total number of hours worked – employees	17,310,149		15,458,046		16,351,113	
Employee TRIR†	0.87		0.83		0.88	
Employee LWDR‡	0.13		0.23		0.13	
Work-related hazards that pose a risk of high-consequence injury – employees and non-employee workers	Mobile equipment interface, pinch points, caught-in, caught-between, and struck-by injuries					
Any workers excluded from this disclosure (and why)	None					

All rates were calculated based on the number of incidents per 200,000 hours worked.

*A salesperson was involved in a fatal motor vehicle accident while driving to the airport in 2018. This devastating incident was the first work-related fatality at Southwire in more than ten years.

†Total recordable injury rate (TRIR) includes all “OSHA Recordable Injuries” —first aid is not included, fatalities are included.

‡ The lost workday rate (LWDR) is calculated as work days missed per 200,000 hours worked, beginning with the first day the employee was to work next.

OMISSION

Information unavailable for 403-9: Types and rates of injury for contractors not tracked. Southwire has no plans to obtain this data at this time.

TRAINING & EDUCATION

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Living Well: Employee Engagement & Retention – Approach Employment Engagement & Retention is a new material topic, previously named “Training and Education” in past reporting.
	103-2 The management approach and its components	Living Well: Employee Engagement & Retention – Approach

GRI 103: MANAGEMENT APPROACH 2016	103-3 Evaluation of the management approach	EMPLOYEE ENGAGEMENT SURVEY			
		For more information, see Living Well: Employee Engagement & Retention – Performance			
			2019	2020	2021
	Participation Rate	84%	89%	87%	
	eNPS	27	40	35	

**GRI 404:
TRAINING &
EDUCATION 2016**

404-3
Percentage of employees receiving regular performance and career development reviews

PARTICIPATION RATE*	2019	2020	2021
By Gender			
Female	88%	90%	77%
Male	84%	88%	68%
By Employee Category			
Executives	86%	95%	94%
Senior Leaders	94%	98%	97%
Site Leaders/Directors	96%	98%	94%
Managers	95%	97%	93%
Individual/ Technical	92%	94%	92%

*Some 2019 and 2020 participation rates were corrected from the previous report for accuracy.

DIVERSITY & EQUAL OPPORTUNITY

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-1
Explanation of the material topic and its Boundary

[Living Well: Diversity, Equity & Inclusion – Approach](#)

Diversity, Equity & Inclusion is a new material topic, previously named “Diversity & Equal Opportunity” in past reporting.

103-2
The management approach and its components

[Living Well: Diversity, Equity & Inclusion – Approach, Responsibilities](#)

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-3
Evaluation of the management approach

[Living Well: Diversity, Equity & Inclusion – Performance](#)

EMPLOYEE RESOURCE GROUPS

Southwire actively promotes six employee resource groups to further our inclusivity mission. Southwire facilitates and encourages all of these groups through our ERG intranet site and social channels.

Group	Purpose
WOMEN'S network	<ul style="list-style-type: none"> Inspires employees to create an environment that embraces inclusivity with an emphasis on women. Provides an avenue to encourage networking, embrace collaboration and empower current and future leaders.
SPECTRUM	<ul style="list-style-type: none"> Fosters a community of inclusivity, diversity and empowerment by valuing all people of color. Serves as a vital resource to promote awareness, cultural differences and the importance of diversity, fostering an environment that encourages investment in the development and engagement of the entire spectrum of Southwire's people
NEXTgen	<ul style="list-style-type: none"> Inspires employees to create an environment that embraces inclusivity with an emphasis on millennials. Provides an avenue to encourage networking, embrace collaboration and empower current and future leaders to master the essences of Southwire
TEAM	<ul style="list-style-type: none"> Builds organizational capability by ensuring the workforce is diverse in all levels of leadership throughout manufacturing facilities to achieve business results. Helps to instill a culture of acceptance of all people and to develop systems that are more than just words on paper, but inclusion in action. Together Everyone Achieves More.
OFFICIUM	<ul style="list-style-type: none"> Enriches the lives of Southwire employees by creating deeper relationships with fellow employees, providing opportunities to serve through veteran outreach and awareness events and by engaging in network and career growth opportunities.
ALLED	<ul style="list-style-type: none"> Advocates for a work environment that respects, welcomes and supports people of all sexual orientations and gender identities and enables them to bring their whole selves to work, allowing them to perform to their full potential.

GRIEVANCE MECHANISMS

Southwire provides numerous channels for employees to raise concerns or submit grievances. When employees deal openly and directly with each other and their supervisors, communications are clearer and the work environment and work attitudes are more positive. Therefore, through our Open-Door Policy, if employees have concerns about working conditions or the business, we strongly encourage employees to voice their concerns to their supervisor. However, employees may also voice their concerns to any manager at their location, their site manager and/or Human Resources representative, all of whom have an Open-Door Policy.

The company also has robust complaint reporting and investigations procedures. Under these procedures, an employee subjected to any conduct that they believe violates Southwire's Standards of Business Ethics and Conduct, the law, or company policies such as Southwire's Equal Employment Opportunity Policy, Anti-Harassment Policy, Workplace Violence Policy, and/or Anti-Retaliation Policy, has numerous reporting channels available to them.

They may report in-person, by phone or by email to a local supervisor or manager, Human Resources representative or Southwire's Ethics and Compliance Office. Additionally, individuals can make reports or ask questions using the company's Doing Right Helpline, which is run by an independent third-party and is available 24/7, 365 days a year. If desired, individuals may make reports anonymously to the Doing Right Helpline through a web portal, by phone or by text. Southwire thoroughly investigates all reports and other indications of potential violations.

Additionally, Southwire employees may use Just Ask, a line of communication to submit questions or concerns through an online or hard copy form, email or phone call. The submission goes to our corporate communications team, which directs the question to the appropriate person to respond, typically within one to two days.

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-3
Evaluation of the management approach

The questions/concerns and responses are shared with leadership on a quarterly basis. Employees can also submit emails to the champions of each ERG through Southwire's intranet site.

DIVERSITY INDICATORS – ONLY U.S. EMPLOYEES*

	2019**	2020**	2021
Female	21.2%	21.5%	22.5%
Male	78.8%	78.5%	77.5%
Underrepresented Communities (URCs)	37.4%	37.3%	41.2%

*Information on employee diversity through SAP SuccessFactors excludes employee data for Canada, Mexico, Honduras, China, and the Netherlands, due to the lack of reporting on ethnic minorities in countries outside of the U.S.

**2019 and 2020 data above has been adjusted from previous year reports to reflect U.S. only data for consistency.

OMISSION

Confidentiality constraints for 405-1: Percentage of individuals within the organization's governance bodies; Percentage of employees per age group and other indicators of diversity. Our goal is to launch environmental outreach programs in 100% of the communities in which we operate.

**GRI 405:
DIVERSITY AND
EQUAL OPPORTUNITY**

405-1
Diversity of governance bodies and employees

LOCAL COMMUNITIES

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-1
Explanation of the material topic and its Boundary

[Giving Back: Community Engagement & Volunteerism – Approach](#)

Community Engagement & Volunteerism was not identified as a tier one topic in our materiality assessment, but remains important to Southwire.

103-2
The management approach and its components

[Giving Back: Community Engagement & Volunteerism – Approach](#)

103-3
Evaluation of the management approach

[Giving Back: Community Engagement & Volunteerism – Performance](#)

**GRI 413: LOCAL
COMMUNITIES 2016**

413-1
Operations with local community engagement, impact assessments, and development programs

[Giving Back: Community Engagement & Volunteerism – Approach](#)

	2019	2020	2021
Number of Volunteer Hours*	12,972	4,485	5,054

*Most volunteer hours served in 2020 and 2021 were virtual due to COVID-19.

SUPPLIER SOCIAL ASSESSMENT

GRI 103: MANAGEMENT APPROACH 2016	103-1	Explanation of the material topic and its Boundary	Supplier Social Assessment is not a material topic but relates to Doing Right: Sustainable Supply Chain & Procurement
	103-2	The management approach and its components	Doing Right: Sustainable Supply Chain & Procurement – Approach
	103-3	Evaluation of the management approach	Doing Right: Sustainable Supply Chain & Procurement – Performance
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016	414-2	Negative social impacts in the supply chain and actions taken	The 30 suppliers in our Supplier Sustainability Program are generally large, multinational corporations with established supply chain programs. Through our audits of these suppliers, Southwire has not uncovered negative environmental or social impacts.

CUSTOMER HEALTH & SAFETY

GRI 103: MANAGEMENT APPROACH 2016	103-1	Explanation of the material topic and its Boundary	Building Worth: Product Quality & Safety – Approach Product Quality & Safety is a new material topic, related to “Customer Health & Safety” in past reporting.
	103-2	The management approach and its components	Building Worth: Product Quality & Safety – Approach
	103-3	Evaluation of the management approach	Building Worth: Product Quality & Safety – Performance

In the unlikely event of a recall, Southwire publishes details about the specific products affected and reasons for the recall.

QUALITY RELATED RETURNS (PERCENT OF REVENUE) *

	2019	2020	2021
	2.1%	1.9%	0.89%

*As measured by Quality Related Customer Credit & Return Dollars (Percent of Gross Revenue).

NON-CONFORMING PARTS PER MILLION

	2019	2020	2021
	246	183	351

*As measured by External Non-Conforming Parts: Wire & Cable (Parts per Million Feet of Product).

**GRI 416:
CUSTOMER HEALTH
AND SAFETY 2016**

416-2
Incidents of non-compliance Concerning
the health and safety impacts of products
and services

ETHICS, ANTI-CORRUPTION & TRANSPARENCY

**GRI 103:
MANAGEMENT
APPROACH 2016**

103-1
Explanation of the material topic and its Boundary

[Doing Right: Ethics, Anti-Corruption & Transparency – Approach](#)

103-2
The management approach and its components

[Doing Right: Ethics, Anti-Corruption & Transparency – Approach](#)

103-3
Evaluation of the management approach

[Doing Right: Ethics, Anti-Corruption & Transparency – Performance](#)

Southwire believes in providing accurate and transparent reporting regarding company performance, challenges and opportunities for improvement. By continuing to communicate via our annual sustainability report and other channels, Southwire will further build support and respect for the company.

For greater transparency, we engage our stakeholders in a variety of ways. In the infrequent case of a spill or other release to the environment, Southwire notifies the appropriate regulatory authorities and informs leadership as soon as possible, as well as our board of directors at regular board meetings. In the case of a high-visibility event, we will inform the public via local press releases.

We are pleased to report there were no monetary fines for regulatory non-compliance in 2021.

NON-GRI DISCLOSURE

TOPIC SPECIFIC INDICATOR

CLIMATE CHANGE & ZERO CARBON TRANSITION

103-1

Explanation of the material topic and its Boundary

[Building Worth: Climate Change & Zero Carbon Transition – Approach](#)

Climate Change & Zero Carbon Transition is a new material topic and is related to “Technology and Innovation” in past reporting.

103-2

The management approach and its components

[Building Worth: Climate Change & Zero Carbon Transition – Approach](#)

GRI 103:
MANAGEMENT
APPROACH 2016

[Building Worth: Climate Change & Zero Carbon Transition – Performance](#)

DEVELOP AND COMMERCIALIZE FOUR BREAKTHROUGH SOLUTIONS TO CUSTOMERS’ SUSTAINABILITY CHALLENGES

Target	2019 Status	2020 Status	2021 Status
Incremental Revenue from Sustainable Products & Solutions (Millions of Dollars)*	\$288 million	\$390 million	\$550 million

103-3

Evaluation of the management approach

*Incremental revenue numbers represent internal estimates, which may not include product returns, price changes, customer discounts and other GAAP revenue disclosure items.

GRI 103:
MANAGEMENT
APPROACH 2016

ACTIVE PATENTS

	2019	2020	2021
	501	415	491

NON-GRI DISCLOSURE

TOPIC SPECIFIC INDICATOR

See our webpage to learn more about [Southwire’s Building Worth initiatives](#)

CUSTOMER EXPERIENCE

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Building Worth: Customer Experience – Approach Customer Experience is a new material topic.
	103-2 The management approach and its components	Building Worth: Customer Experience – Approach
	103-3 Evaluation of the management approach	Building Worth: Customer Experience – Performance
NON-GRI DISCLOSURE	TOPIC SPECIFIC INDICATOR	Southwire is committed to making it easy for our customers to do business with us. We measure our progress in this area through our Ease of Doing Business rating. Our Net Promoter Score (NPS) measures customer experience and helps predict business growth. Customer Experience was identified as a new material topic in 2021, and Southwire is in the process of developing a public metric to report on the topic’s management.

CYBERSECURITY & DATA PRIVACY

GRI 103: MANAGEMENT APPROACH 2016	103-1 Explanation of the material topic and its Boundary	Doing Right: Cybersecurity & Data Privacy – Approach Cybersecurity & Data Privacy is a new material topic.
	103-2 The management approach and its components	Doing Right: Cybersecurity & Data Privacy – Approach
	103-3 Evaluation of the management approach	Doing Right: Cybersecurity & Data Privacy – Performance
NON-GRI DISCLOSURE	TOPIC SPECIFIC INDICATOR	Southwire is aware of the significant negative risks cyber-attacks and data breaches can have on a company's success, relationships and reputation. In addition to abiding by the National Institute of Standards and Technology (NIST) cybersecurity framework and maintaining strong governance, we protect our systems by training and education our workforce. We closely track the completion of our annual trainings to ensure the security of our systems and our employees' ability to detect threats.

UNGC INDEX

UNGC PRINCIPLE

REPORT LINKS

SPECIFIC SECTIONS

HUMAN RIGHTS

1. Businesses should support and respect the protection of internationally proclaimed human rights.

[Doing Right – Sustainable Supply Chain & Procurement](#)

- Supplier Sustainability Program
- Human Rights Policies

2. Business should make sure that they are not complicit in human rights abuses.

[Doing Right – Sustainable Supply Chain & Procurement](#)

- Supplier Sustainability Program
- Human Rights Policies

LABOUR

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

[102-41 Collective bargaining](#)

- Collective bargaining agreements

[403 Occupational Health & Safety](#)

- Collaboration with Unions

4. Business should uphold the elimination of all forms of forced and compulsory labour.

[Doing Right – Sustainable Supply Chain & Procurement](#)

- Supplier Sustainability Program
- Human Rights Policies

5. Business should uphold the effective abolition of child labour.

[Doing Right – Sustainable Supply Chain & Procurement](#)

- Supplier Sustainability Program
- Human Rights Policies

6. Business should uphold the elimination of discrimination in respect of employment and occupation.

[Living Well – Diversity, Equity & Inclusion](#)

- GRI 405 Diversity and Equal Opportunity
- Southwire DEI Metrics
- Our Seven Strategic DEI Focus Areas
- Responsibilities

UNGC PRINCIPLE

REPORT LINKS

SPECIFIC SECTIONS

7. Businesses should support a precautionary approach to environmental challenges.

[Building Worth – Climate Change & Zero Carbon Transition](#)

- Approach
- Addressing Climate Risks

[Growing Green – Energy & GHG Emissions](#)

- Approach
- Operational Approach: Energy & GHG Management
- On-Site Approach: Renewable Energy Program

[Growing Green – Materials, Recycling & Circular Economy](#)

- Approach
- Materials Management and Reuse

[Growing Green – Water & Wastewater](#)

- Approach
- Water Management
- Environmental Management Systems

[Doing Right – Sustainable Supply Chain & Procurement](#)

- Approach
- Supplier Sustainability Program
- Strategic Sourcing & Procurement
- Metals Suppliers
- Supplier Diversity
- Human Rights Policies

8. Business should undertake initiatives to promote greater environmental responsibility.

[Growing Green – Energy & GHG Emissions](#)

- Responsibilities
- Operational Approach: Energy & GHG Management
- On-Site Approach: Renewable Energy Program

[Growing Green – Materials, Recycling & Circular Economy](#)

- Responsibilities
- Materials Management and Reuse

[Growing Green – Water & Wastewater](#)

- Responsibilities
- Water Management
- Environmental Management Systems

9. Business should encourage the development and diffusion of environmentally friendly technologies.

[Building Worth – Climate Change & Zero Carbon Transition](#)

- Approach
- Additional Opportunities
- Performance

UNGC PRINCIPLE

REPORT LINKS

SPECIFIC SECTIONS

ANTI-CORRUPTION

10. Businesses should work against corruption in all its forms, including extortion and bribery.

[Doing Right – Ethics, Anti-Corruption & Transparency](#)

- Approach
- Ethics and Compliance Program Charter
- Code of Conduct and Anti-Corruption Training