

Policy Title: Responsible Minerals Sourcing Policy	Policy #: Metals 0001-001
Type: Minerals/Metals Sourcing	
Replaces: Conflict Minerals, Policies and Procedures	Effective Date: March 29, 2024

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Purpose:

The purpose of this Responsible Minerals Sourcing Policy (the “**Policy**”) is to set forth Southwire's position regarding its responsible sourcing of minerals that is contained in its products and to communicate its policy, procedures, and behavioral expectations.

Scope:

This Policy applies to all employees of Southwire Company, LLC and its subsidiaries and other affiliates, wherever located worldwide (collectively and individually, “**Southwire**” or the “**Company**”).

Responsible mineral sourcing is the practice of procuring raw minerals in a way that respects human rights, protects human and environmental health, and combats forced labor, child labor, human trafficking and slavery.

Southwire has five core tenets: Growing Green, Living Well, Giving Back, Doing Right and Building Worth. Doing Right seeks to ensure the highest standard of ethical business practices within all our operations. We recognize that we have a responsibility to source minerals ethically, regardless of our regulatory obligations, and perform due diligence to determine the origin of any minerals that may have been sourced from high-risk regions.

Policy:

Southwire supports industry-wide efforts to identify, reduce, and eliminate the use of conflict minerals originating from the DRC and adjoining countries that are financing or benefiting groups committing human rights violations under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. To further this goal, Southwire leverages the Conflict Minerals Reporting Template (CMRT) and/or the Extended Minerals Reporting Template (EMRT) developed by the Responsible Minerals Initiative (RMI) to gather and exchange supply chain information and other methods of survey.

While Southwire is not a public company listed on a United States stock exchange, we do business with U.S. public companies and will assist our clients' efforts to conduct annual Reasonable Country of Origin Inquiry (RCOI) and due diligence in support of their filing. Southwire will not knowingly use Conflict Minerals in our products. Southwire does not typically, source tin, tantalum, tungsten, or gold (3TG) and other metals beyond 3TG directly from mines, smelters, or refiners, and in most cases, several levels removed from these market participants.

Process:**Use of Minerals**

Southwire tracks emerging laws and industry practices related to minerals and metals beyond 3TG. We have evaluated our responsible minerals program and expanded our scope of minerals to include cobalt, mica, copper, and others as emerging minerals with supply chain due diligence requirements. Southwire is committed to complying with the applicable requirements and has implemented a due diligence process that aligns to the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act to meet its obligations.

Monitoring Suppliers Activities

Suppliers to Southwire are expected to establish their own responsible minerals policies, due diligence frameworks, and management systems that align with RMI and OECD guidance. Suppliers' programs should be designed to prevent conflict minerals from being included in the products sold to Southwire. In the event Southwire determines that a supplier has failed to develop and implement reasonable steps to comply with this policy, Southwire reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

Where to Go with Questions and Concerns

Contact the Metals or Sustainability Department with any questions or concerns at: Metals@southwire.com & Sustainability@southwire.com

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

- (1) Website – www.doingrightconnection.com
- (2) Phone – You may call the Helpline free of charge. The number in the United States is +1 (800)504-9514. Phone numbers outside of the United States and further instructions are available at www.doingrightconnection.com.
- (3) Text Message – +1 (678)780-4262

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

Anti-Retaliation

Southwire will not tolerate any retaliation, retribution, bullying, harassment, demotion or other direct or indirect reprisals by any employee against any person who reports, in good faith, a concern or suspected violation of this Policy, or against a person who is assisting in an investigation or process involving a suspected violation of this Policy. Retaliation against an employee who makes a report under the Policy in good faith is strictly prohibited. Anyone who retaliates against an employee for making reports to Southwire in good faith or violates this Policy or the Company's Anti-Retaliation Policy, is subject to disciplinary action up to and including termination of employment.

Discipline

Due to the wide range of negative impacts on the Company, including possible criminal and civil liability, that could be triggered by an individual's violation of the requirements in this Policy, you may receive disciplinary action for violations of this Policy, up to and including termination of employment.

Additional Information:

- None

Exhibits and Attachments:

- None

Revision History:

Date	Policy Version Number	Revisions Made	Revised by	Approved by
9/30/15	GA-02-10			
8/21/23	Metals 0001-001	Sections added	Mark Rogers	
03/29/2024	Metals 0001-001	Implementation Date	Mark Rogers	

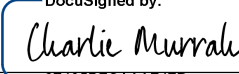
Approvals:

Policy Sponsor: Burt Fealing, EVP, General Counsel, Chief Ethics & Compliance Officer

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Signature _____ Date 3/21/2024 _____

Policy Owner: Charlie Murrah, EVP, Chief Supply Chain Officer

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Signature _____ Date 3/25/2024 _____