



Conflict Minerals
Policies and Procedures Manual

Policy # GA-02-10

Effective Date: 9/30/2015

Replaces:

Purpose:

The purpose of this document is to set forth Southwire's position regarding Conflict Minerals used in its products and to communicate its policy, procedures, and behavioral expectations.

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The Law:

Conflict Minerals are certain minerals mined from a location described as the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. Under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Conflict Materials are determined by the Securities and Exchange Commission (SEC), in consultation with the United States Department of State. Disclosure of Conflict Minerals in annual filings is required by SEC regulations if the material is necessary to the functionality or production of a product. Under the current SEC regulations, only tin, tungsten, tantalum, and gold are defined as Conflict Minerals.

Policy:

Southwire is not subject to the SEC rules. However, in our supply-chain role, we provide products to customers who may have their own reporting obligations under the Conflict Minerals rules. In order to support our customers with reporting requirements, Southwire will not knowingly use Conflict Minerals in our products. Southwire does not typically source tin, tantalum, tungsten, or gold directly from mines, smelters or refiners, and, accordingly, in most cases, is several levels removed from these market participants. Southwire is committed to obtain available information from our suppliers regarding tin, tantalum, tungsten, or gold in products that may be contained in and necessary for the functionality of our products.

Process:**USE OF CONFLICT MINERALS**

Southwire will use information it has about material composition of our products to identify those materials that potentially can contain metals extracted from tin, tantalum, tungsten, or gold and identify the suppliers of those products. Southwire will work with our suppliers to trace material content in all of our products in order to determine whether minerals originating from mining or smelting operations in the Conflict Region are used in our products. We will not knowingly use minerals from the Conflict Region in our products.

MONITORING SUPPLIERS' ACTIVITIES

Southwire will practice reasonable due diligence with our supply chain to assure that tin, tantalum, tungsten, or gold are not being sourced from mines in the Conflict Region, which is controlled by non-government military groups, or unlawful military factions. Southwire will periodically request written certifications and other information concerning the origin of conflict minerals included in products and components supplied to it.

Additional Information:**Other Documents and Attachments:**

- None

Principal Contact:


- SVP, Sustainability, Safety and Environment

Revision History

- None

APPROVALS:

Legal Review:



Signature

9/17/15
Date

Management Approval:



Signature

9/23/15
Date

Executive Approval:



Signature

9/23/15
Date

Internal Audit:



Signature

10/26/15
Date