

## Superior Essex Conflict Minerals Policy

(Updated 1-2015)

### I. Introduction

The US Securities and Exchange Commission (“SEC”) adopted rules under the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act for reporting and disclosing “conflict minerals” in response to violence and human rights violations in the mining of certain minerals from conflicted areas situated in the eastern portion of the Democratic Republic of Congo and 9 of its adjoining countries (collectively, the “DRC”). The rules require manufacturers who file reports with the SEC to disclose whether the product they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products. The conflict minerals are gold, tantalum, tin, and tungsten. The SEC rules also require companies to disclose their supply chain inquiries to verify whether or not the conflict minerals originated in the DRC.

### II. Superior Essex Policy

Superior Essex supports the humanitarian goal of ending violence in the DRC and is committed to the responsible sourcing of conflict minerals throughout its supply chain. Accordingly, Superior Essex has adopted this conflict minerals policy (“Policy”) and expects all of its suppliers to adopt a similar policy and meet the expectations set forth herein. In support of this Policy, Superior Essex will only purchase products containing conflict minerals that are DRC conflict free<sup>1</sup>. Superior Essex has conducted due diligence regarding all of the products it manufactures and distributes to determine the presence of any conflict minerals and where they are sourced.

### III. Expectations for Suppliers

Superior Essex expects all suppliers who provide products to Superior Essex that contain conflict minerals to adhere to the following:

- Suppliers should only provide Superior Essex products that are DRC conflict free.
- Suppliers should conduct due diligence to ensure the products sold to Superior Essex are DRC conflict free. Suppliers are expected to put in place procedures of traceability of conflict minerals and maintain reviewable business record supporting the source of conflict minerals. In addition, suppliers should provide Superior Essex upon its request with information concerning the origin of any conflict material.
- Suppliers should implement conflict mineral policies consistent with this Policy which should be passed down to their suppliers.

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<sup>1</sup> “DRC conflict free” means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups as defined in SEC Rule 13p under the SEC Act of 1934.