



Human Rights and Prevention of Human Trafficking Policy

Effective Date: 08-20-2020

Replaces: Human Trafficking Policies and Procedures Manual dated 3/31/2015

Purpose:

Respect for human rights is a fundamental Southwire principle, and one that all Southwire employees, suppliers, contractors, and other business associates are expected to honor. Southwire and its suppliers, contractors, and other business associates will uphold the human rights of all individuals associated with their organizations and have a zero-tolerance policy for Human Trafficking, Forced Labor, and Child Labor. Further, an unethical representative can damage Southwire's reputation and expose the Company and our representatives to criminal liability, resulting in severe fines, penalties and other sanctions. This Policy establishes the Company's policy, procedures, and expectations regarding Human Trafficking, Forced Labor, and Child Labor to ensure ethical, fair and lawful treatment of all individuals providing labor used in connection with the Company's business operations.

Scope:

This Human Rights and Prevention of Human Trafficking Policy (the "**Policy**") establishes the Company's policy, procedures, and expectations regarding Human Trafficking, Forced Labor, and Child Labor, each of which are defined below.

This Policy applies to all Company representatives, which includes employees of Southwire Company, LLC and its subsidiaries and other affiliates, wherever located worldwide (collectively and individually, "**Southwire**" or the "**Company**") and all of Southwire's business associates (i.e., suppliers, distributors, sales representatives, contractors, partners, and consultants), wherever located (collectively referred to along with Southwire as "**Covered Persons**"). Additionally, there may be supplemental policies related to this Policy that apply to employees who work in particular locations or for particular subsidiaries, affiliates, or business units of the Company.

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Policy:

1. PROHIBITION ON HUMAN TRAFFICKING, FORCED LABOR, AND CHILD LABOR

All employees of Covered Persons shall be guaranteed freedom of movement, and employment must be freely chosen by those employed by Covered Persons. It is the policy of Southwire that Covered Persons must never engage in Human Trafficking, Forced Labor, or Child Labor. For purposes of this Policy, the following definitions apply:

- **“Human Trafficking”** means modern slavery and involves the exploitation of a person for the purposes of compelled labor or a commercial sex act through the use of force, fraud, or coercion.
- **“Forced Labor”** means involuntary, forced, prison, bonded (including debt bondage), indentured, or slave labor.
- **“Child Labor”** means employing or using the labor of child workers younger than the applicable required minimum age, or using a child for work that is physically, socially or morally dangerous and harmful or that deprives a child of an education.

To comply with this Policy, Covered Persons must:

- Have in place policies and procedures to ensure that applicants and employees meet the legal minimum employment age.
- Have in place policies and procedures that prohibit the procurement of commercial sex acts.
- Conduct reasonable, risk-based due diligence on third parties engaged by the Covered Person to prevent use of third parties that engage in Human Trafficking, Forced Labor, or Child Labor.
- If required by local applicable laws, provide an employment contract, recruitment agreement or other work document in writing in a language understood by the employee. Covered Persons must not use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as (a) failing to disclose, in a format and language accessible to the employee, basic information; or (b) making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

- Permit workers to leave work or terminate their employment at any time subject to the Covered Person's end-of-employment process and applicable laws. Covered Persons must not hold or otherwise destroy, conceal, confiscate, or deny access of employees to their identity or immigration documents, or other valuable items, including passports, drivers' licenses, work permits, or other travel documentation, regardless of issuing authority. The retention of personal documents shall not be used to bind workers to employment or restrict their freedom.
- Use a recruiting plan or policy that permits only the use of recruiting companies with trained employees that comply with applicable local labor laws of the country in which the recruiting takes place, prohibits charging employees recruiting fees, and requires wages that meet applicable host-country requirements. Covered Persons must not require workers to pay employers' or agents' recruitment fees or other related fees for their employment. The Covered Person must repay any such fees if found to have been paid by workers. Recruitment fees include, but are not limited to, costs associated with travel to the receiving country, processing official documents and work visas in both home and host countries.
- When providing or arranging employee housing, maintain a housing plan that meets the host country housing and safety standards.
- Maintain policies and procedures prohibiting the Covered Person's agents and sub-contractors from engaging in Human Trafficking, Forced Labor, and Child Labor and providing for the termination of any agents, sub-contractors or sub-contractor employees that have engaged in any such activities.
- Provide return transportation or pay for the cost of return transportation upon the end of employment for all employees who are not nationals of the country in which the work takes place and who was brought into that country for the purpose of working for the Covered Person, if required by applicable local laws.
- Comply with applicable local law requirements for an annual reporting statement on human trafficking, forced labor, child labor, or modern slavery.
- Comply with applicable flow-down provisions of the U.S. Federal Acquisition Regulations ("FAR") prohibiting contractors and sub-contractors from engaging in human trafficking and imposing restrictions on use of convict labor.

2. SOUTHWIRE'S ENGAGEMENT OF COVERED PERSONS

To ensure that Covered Persons with whom Southwire engages do not engage in Human Trafficking, Forced Labor, or Child Labor in performing their duties for Southwire, Southwire will: (1) conduct reasonable, risk-based due diligence on our business associates and other third parties; (2) engage business associates using written contracts that include appropriate anti-Human Trafficking, anti-Forced Labor, and anti-Child Labor protections; (3) periodically request written certifications and other information concerning the use of these practices in making the products

and components supplied to it; (4) monitor for potential “red flags” indicating possible misconduct in this area; and (5) periodically provide training for relevant Covered Persons on this Policy.

3. ACCURATE BOOKS AND RECORDS AND ADEQUATE INTERNAL CONTROLS

U.S. prosecutors treat any private company’s false books and records, sloppy recordkeeping, and omissions of improper payments from company accounts as potential evidence of a “tone at the top” that is not committed to compliance and ethics, as well as possible evidence of corrupt or deceitful activities and intentions. Prosecutors also have viewed false books and records, and inadequate internal controls, as creating an environment for corrupt practices at that company. Southwire’s books and records must be accurate, and our internal system of financial controls and authorizations must be maintained and followed. Any false or incorrect recordkeeping is prohibited and would violate this Policy.

Among other things, Covered Persons must implement and maintain a reliable system to verify the eligibility of all workers, including age eligibility and legal status of foreign workers, and implement and maintain a reliability recordkeeping system in connection with such verification system.

4. REPORTS AND QUESTIONS

You must immediately report to the Ethics and Compliance Office any information that you believe may relate to a suspected violation of this Policy. Reports must be made immediately to Southwire’s Ethics and Compliance Office as follows:

- (1) **In-Person** – Ethics and Compliance Office
Southwire Company, LLC
One Southwire Drive
Carrollton, Georgia USA 30118
- (2) **Phone** – +1 (770) 832-4201
- (3) **Email** – doing.right@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.

In addition, Covered Persons may report concerns or ask questions directly to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org. In such an event, Covered Persons also must report any such concerns to Southwire using one of the above channels.

5. NO RETALIATION

Southwire will not tolerate any retaliation, retribution, bullying, harassment, demotion or other direct or indirect reprisals by a Covered Person 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 a person who makes a report under the Policy in good faith is strictly prohibited.

6. DISCIPLINE AND PENALTIES

Any Covered Person who violates this Policy, or who retaliates against a person for making reports to Southwire in good faith or who otherwise violates the Company's Anti-Retaliation Policy, is subject to disciplinary action up to and including termination of employment; termination of their project, agreement, or relationship with the Company; and other possible sanctions. Additionally, individuals or companies which violate this Policy or applicable laws may be subject to criminal fines and penalties, up to and including imprisonment.

7. COOPERATION WITH INVESTIGATIONS

All Covered Persons are required to cooperate in any internal or external investigation of suspected wrongdoing under this Policy.

8. DISCLOSURE TO REGULATORY AGENCIES

Southwire will take appropriate remedial and corrective measures with respect to Company policies, procedures and compliance programs, and make any disclosures to regulatory agencies or authorities warranted after Southwire's management and board of directors, in consultation with Southwire's Ethics and Compliance Office and/or Legal Department, make the appropriate determinations applicable laws from the facts and circumstances presented.

Other Documents:

- Code of Business Conduct – Doing Right, The Right Way
- Anti-Retaliation Policy and Guidelines
- Whistleblower Protection Policy and Guidelines
- Employee Handbook
- Minimum Employment Age – Human Resources Policies and Procedures dated 12.1.2017

Exhibits and Attachments:

- None

Principal Contact:

- EVP, General Counsel and Chief Ethics and Compliance Officer
- Human Resources, Director of Compliance

Revision History

- None

Approvals:

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