

Southwire Company EHS Management System

EHS Policy and Principles

1.0 EHS Policy:

Southwire is committed to operating its facilities in compliance with applicable local, State/Provincial, and Federal environmental, health and safety (EHS) regulations, as well as implementing more stringent internal standards when necessary to protect our environment, our employees, and the general public.

We are dedicated to a prevention strategy to reduce or eliminate pollution and health and safety risk at the source, through a hierarchy of control. We are committed to continual improvement of our management systems to enhance performance, engage employees, and work toward goals of zero waste generation and zero work-related injuries and illnesses.

2.0 EHS Principles:

Southwire recognizes the universal need for care and protection of our natural resources. In addition, Southwire acknowledges that our greatest asset is our people, and we seek to create a workplace where employee safety and health are always top priority. To fulfill its corporate role in these areas, Southwire sets forth and pledges to strictly abide by the following principles:

- **Compliance** – Southwire will comply with all applicable local, State/Provincial and Federal environmental, health, and safety regulations.
- **Personnel** – The management of Southwire’s EHS policies and programs is a senior-level responsibility, and the manager thereof will be qualified and expected to champion EHS causes in the company. He/she will report to the Southwire President and Chief Executive Officer.

The Southwire President and CEO will take a personal interest in environmental, health, and safety matters, providing initiatives to promote safe, clean operations.

Each Southwire facility will have assigned on-site personnel responsible for day-to-day EHS management. Each facility manager is responsible for ensuring environmental compliance and employee health and safety at his or her facility.

- **Waste Minimization and Disposal** – Southwire will monitor and change processes and/or raw materials, where feasible, to reduce the volume and toxicity of waste generated. Wastes that are unavoidably generated will be managed in accordance with regulatory agency-approved methods. We will recycle and reuse waste materials to the greatest extent feasible. Southwire endeavors to make conservation and recycling a way of life for the company.
- **Energy** – Southwire will conserve energy through elimination of waste and increased end-use efficiency. We will maximize the energy efficiency of our existing operations and save energy to the greatest feasible extent. In addition, Southwire commits to developing new systems with lower energy consumption, to upgrading existing systems with high efficiency

technology, and substituting energy intensive inputs where feasible.

- **Health and Safety** – Southwire will insist upon providing a safe work environment for our employees. Where possible, we will implement measures to eliminate or minimize safety risks and, if necessary, provide our employees the appropriate safety equipment needed to protect them from work hazards.
- **Communications** – Southwire will insist on frank and open dialogue with the news media, regulatory agencies, our customers and suppliers, and the general public regarding EHS matters. We will strive to foster constructive working relationships with government and non-government organizations.
- **Emergency Response** – Southwire will constantly strive to anticipate and eliminate potential hazards. In addition, we will implement contingency plans adequate to protect persons and the environment from accidental spills or chemical releases.
- **Training** – Southwire will provide the necessary instruction to educate and motivate its employees to apply safe and environmentally sound work practices.
- **Monitor and Improve** – Southwire will diligently monitor all EHS management systems and search for ways to improve these systems wherever possible.

3.0 Signatory Requirements:

A number of Federal and State environmental statutes and regulations establish report and document submittal requirements which include signatory and certification provisions. Although the author of the reports and documents may be the EHS staff or other party, the facility manager is responsible for signing and certifying all applicable permit applications, reports, and compliance plans, as required.

4.0 Corporate EHS:

The Corporate EHS department is available to support and assist facility managers and EHS as needed in all EHS areas.

5.0 Revision History:

<u>Rev. No.</u>	<u>Revision Date</u>	<u>Reason for Revision</u>
0	5/1/1994	Policy issued
1	3/28/2002	Minor edits; update leadership signatures
2	8/1/2010	Expanded to include environmental principles
3	8/05/2015	Updated to include health and safety