



Human Trafficking
Policies and Procedures Manual

Policy # GA-02-09

Effective Date: 3/31/2015

Replaces: _____

Purpose:

The purpose of this document is to set forth Southwire's position regarding Human Trafficking, Slavery, Forced Labor and Child Labor used in its products and to communicate its policy, procedures, and behavioral expectations.

Contents:

Purpose:	1
Contents:	1
The Law	1
Policy:	2
Procedure(s):	2
Additional Information:	2
Other Documents and Attachments:	2
Principal Contact:	2
Revision History	2
APPROVALS:	3

The Law:

Human Trafficking is defined by Social Accountability International as the recruitment, transfer, harboring or receipt of persons, by means of the use of threat, force, or other forms of coercion or deception for the purpose of exploitation. There are a number of laws in the United States and other countries which prohibit these practices.

Policy:

Southwire is committed to ensuring that its suppliers do not use slave labor, child labor, or engage in human trafficking. Southwire's values and its Code of Business Ethics and Conduct establish respect for human rights as a fundamental Southwire principle, and one that both Southwire employees and suppliers are expected to honor. This policy applies to Southwire and all of its subsidiaries and affiliates.

Procedure(s):

PROHIBITION OF FORCED LABOR

Southwire will not engage in involuntary, forced, prison, bonded, indentured, or slave labor, human trafficking or the hiring of trafficking and debt bondage victims. All employees shall be guaranteed freedom of movement. Southwire will conduct due diligence to prevent the

recruitment or hiring of victims of trafficking, debt bondage or other types of exploitation by third parties such as labor brokers or Suppliers.

PROHIBITION OF CHILD LABOR

Southwire will not use Child Labor. See Policy HIRE 001-098 Applicants and Hiring – Minimum Employment Age for specifics.

PROHIBITION OF HARASSMENT AND ABUSING

Southwire will take all the steps to ensure a work environment free of Harassment, Abuse and Corporal Punishment in any form. See Policy ECON 010-98 Employee Conduct – Sexual Harassment and Policy ECON 012-098 Employee Conduct - Harassment for specifics and the compliant procedure.

MONITORING SUPPLIERS' ACTIVITIES

Southwire will practice reasonable due diligence with our supply chain to assure that Human Trafficking and the use of Child labor are not used by our suppliers. Southwire will periodically request written certifications and other information concerning the use of these practices in making the products and components supplied to it.

Additional Information:

Other Documents and Attachments:

Policy HIRE 001-98 Applicants and Hiring – Minimum Employment Age; Policy ECON 010-98 Employee Conduct – Sexual Harassment, and Policy ECON 012-98 Employee Conduct - Harassment

Principal Contact:

- SVP, Sustainability, Safety and Environment

Revision History

- None

APPROVALS:

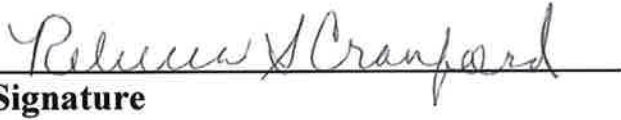
Legal Review:



Signature

3/31/15
Date

Management Approval:



Signature

4/23/15
Date

Executive Approval:



Signature

4/24/15
Date

Internal Audit:



Signature

4/23/15
Date