

California Transparency in Supply Chain Act Disclosure

Superior Essex and its operating companies (the “Company”) are committed to observing high ethical standards in the conduct of its business, including the elimination of activities in our supply chain that could be considered abusive or exploitive, including human trafficking and slavery.

The Company expects its suppliers to obey the laws requiring fair treatment of workers and a safe and healthy work environment. This includes compliance with all laws and regulations related to human trafficking and slavery. The Company’s contracts with its suppliers require the suppliers to be in compliance with all applicable laws, which would include the production of goods sold or used by the Company.

The Company provides training to employees and managers who have responsibility for supply chain management. The training covers issues that include but are not limited to, forced labor, child labor, human trafficking and slavery and mitigating the risks of its supply chain being impacted by the same. Additionally, all employees are required to acknowledge and adhere to our *Standards of Business Conduct* and *Code of Ethics*, which includes the requirement to comply with all laws in all places where the Company does business.

To monitor compliance with the expectations of the Company, the Company, instead of a third party vendor, assesses its suppliers to identify the level of risk associated with each supplier and their compliance with the laws relating to the treatment of their workers. Any supplier that is deemed high-risk by the Company may be audited to ensure compliance with human trafficking and slavery regulations. The Company will swiftly address violations of any human trafficking and slavery regulations if it becomes aware that they exist within its supply chains. Should a supplier continue to fail to meet its standards, the Company will seek to eliminate such supplier from the supply chain. In addition, the Company will cooperate fully with state, federal and foreign agencies that are responsible for enforcing these laws.

The Company is dedicated to the principles of this policy and believes this policy will help prevent human trafficking and slavery within its supply chains.