

DOING RIGHT

ETHICS & COMPLIANCE

THE RIGHT WAY

Southwire Holding Company BOARD OF DIRECTORS CODE OF CONDUCT

DOING RIGHT, THE RIGHT WAY

Southwire and its subsidiaries and other affiliates are committed to honesty, integrity, and fair dealing in all of their business activities. The Board has a unique role in fostering a culture of ethics and compliance within the Company. Board members serve as leadership role models for Southwire's values, ethics, and standards of business conduct and set the tone for the Company through their interactions with employees, shareholders, and the communities in which Southwire operates. The Board also supports Southwire's management team in ensuring the business is empowered with sufficient resources and authority to implement the Company's Doing Right vision.

Board members must exercise reasonable care, good faith, objectivity, and due diligence in carrying out Board-related responsibilities. Board members are expected to hold themselves and other Board members accountable to this Code of Conduct and Southwire's values and standards of business conduct. This includes engaging in certain behaviors and refraining from others. The following list is provided as an example, but is not intended to be exhaustive:

DOs

DO carry out your responsibilities in compliance with:

- this Code of Conduct;
- applicable policies and procedures; and
- all laws and regulations applicable to Southwire (including anti-bribery and insider trading laws).

DO use resources and assets primarily for business purposes and not for personal gain or use or the benefit of others.

DO report any actual or suspected violation of this Code and other Southwire policies to the General Counsel, do cooperate with any investigation, and do refrain from using your position of authority to influence an investigation or resulting disciplinary action.

DO respect the diversity of opinions expressed by other Board members and company management and promote collaboration, cooperation, and partnership among Board members.

DO avoid situations in which your personal interests conflict, or create the appearance of a conflict, with the interests of Southwire and do disclose actual or potential conflicts of interest to Southwire's General Counsel.

DO contact the General Counsel before discussing Company-related matters with the media.

DON'Ts

DO NOT use information or opportunities learned in your capacity as a Board member for the benefit of yourself or third parties unrelated to Southwire, or in furtherance of an illegal or unethical scheme. For example, do not share or use information about a publicly-held company that Southwire is considering purchasing or about which Southwire has confidential information.

DO NOT disclose the nonpublic information entrusted to you (unless authorized to disclose it).

DO NOT violate Southwire's anti-retaliation policy by taking retaliatory action against anyone raising a good faith report of misconduct or cooperating with an investigation.

DO NOT tolerate any kind of discrimination or harassment in the workplace.

DO NOT participate in decisions involving customers, suppliers, or competitors in which you or your immediate family member has a direct or indirect financial interest and do not engage in any business or entity that pursues the same business opportunities as Southwire.

DO NOT engage in lobbying activities on behalf of Southwire and do not use Southwire property for political purposes (without prior approval of the General Counsel).