



2016 Sustainability Report

Superior Essex International LP

March 2016

"Sustainability is a means by which we can make a real impact in the communities and industries we serve, not only in terms of pursuing new opportunities in the marketplace, but also in terms of setting an example of responsible business and manufacturing practices. By enacting sustainable practices we are able to conserve tremendous amounts of natural resources and drastically reduce our environmental footprint, and pass these benefits along to our customers."

Brad R. Johnson

President of Superior Essex International LP, Communications Division

2016 Sustainability Report

Superior Essex International LP

TABLE OF CONTENTS

I. The Environment	2	II. Corporate Social Responsibility	16
A. Environmental Policy	2	A. Business Code of Ethics	16
B. Superior Essex Environmental Plan	2	1. The Code of Ethics	16
C. Key Environmental Metrics	3	B. Supply Chain	16
1. Waste Diversion	3	1. Supplier Code of Conduct	16
2. Greenhouse Gas Emissions	3	C. People and Community	17
3. Conservation	3	1. Community Involvement and Outreach	17
4. Hazardous and Non-Hazardous Waste	3	2. Highlighted Community Participation	17
D. Sustainability Leadership	4	3. Employee Wellness	18
1. Life Cycle Assessment (LCA)	4	D. Employee Health and Safety	18
2. Environmental Product Declaration (EPD)	4	1. Superior Essex Safety Optimization Plan	18
3. Health Product Declaration™ (HPD™)	5	III. Operations and Supply Chain	19
4. Certified Environmental Facts	6	A. Optimization of Manufacturing Processes/Process	
5. Supporting Memberships, Participation, and Expertise ..	7	Modernization	19
6. Summary of Environmental Product Certifications	8	B. Inventory and Supply Chain Management	20
E. Environmental Initiatives	8	1. Professional Certifications and Associations	20
1. Landfill Diversion	8	2. Lean Manufacturing Principles	20
2. E-Waste Disposal	9	3. Six Sigma Approach	21
3. Recycling Programs	10	IV. Quality Assurance	21
4. Packaging and Shipping	10	A. ISO 9001 / TL 9000 Quality Management Systems	21
5. Energy Conservation	11	1. Brownwood, TX Registrations	22
6. Product Development	11	2. Hoisington, KS Registrations	23
F. Substances of Concern	11	B. Third Party Quality Assurance Program Participation	23
1. Restriction of Hazardous Substances			
(RoHS) — 2 Directive	12		
2. REACH Directive	12		
3. Technical Support	13		
G. Environmental Management System (EMS)	13		
1. EMS Overview	13		

I. The Environment

Superior Essex is committed to the protection of the environment and the health and safety of its employees, customers and neighbors. This commitment is applied worldwide. The Company's Environmental Policy embodies this commitment to the environment, health and safety and provides guidance to implement its requirements.

All employees of the Company are expected to be well informed as to the environmental concerns of their operation, and must be responsible for compliance with this policy as it may impact their location, operations and function.

A. Environmental Policy

It is the established policy of Superior Essex to conduct its affairs in an environmentally responsible manner. It has been and will continue to be the policy of Superior Essex to comply with all federal, state, and local environmental laws and regulations and to preserve and protect the natural environment including the air, water, land and other natural resources. In furtherance of this policy, the Company will:

- Maintain full compliance with the law in all operations
- Maintain awareness of the law
- Cooperate with all government authorities
- Prevent pollution
- Understand our environmental impacts
- Communicate the Environmental Policy to all employees
- Deploy practices and procedures to implement the policy
- Review effectiveness of our environmental protection activities
- Report the status of environmental compliance to top management
- Recycle, reuse, and conserve energy and other resources

B. Superior Essex Environmental Plan

Superior Essex focuses on conservation, recycling, and minimizing any negative environmental impact on the worldwide community. Our aim is to continuously reduce our environmental footprint and to preserve and protect the natural environment. Our plan includes improving environmental impacts through:

- Focus on Manufacturing
 - » Recycling and reuse
 - » Material usage reduction
 - » Closed loop extrusion water systems
 - » Elimination of hazardous materials or substances of concern (RoHS 2 and REACH)
- Waste Diversion from Landfill
- Packaging and Shipping
 - » Use of recyclable packaging materials
 - » Use of biodegradable inks and adhesives

- » Modern logistics practices
- Energy Conservation
 - » Capital investments to deploy energy efficient production equipment
 - » Energy efficient lighting systems in manufacturing

C. Key Environmental Metrics

1. Waste Diversion

Superior Essex has emerged as an industry leader in the area of waste diversion. The Hoisington, KS facility is the industry's first 3rd party certified "Zero Waste to Landfill" facility and has been recognized for innovative waste tracking and management programs. From 2012-2014, Superior Essex has diverted more than 25,000,000 pounds of waste from landfills through recycling, reuse and incineration.

2. Greenhouse Gas Emissions

Superior Essex is committed to reducing our environmental impact by improving the greenhouse gas emissions from our communications cable factories and product development center. Capital investments and conservation efforts have led to improvements in both Scope 1 and Scope 2 emissions since 2012.

GREENHOUSE GAS EMISSIONS	REDUCTION 2012 - 2014
GHG Scope 1	47%
GHG Scope 2	7%

3. Conservation

Efficient use of electricity, water, and other fuel sources are an integral part of the overall sustainability plan at Superior Essex. State of the art lighting systems, energy efficient production equipment, and closed loop water systems contribute to significant reductions in our energy and water use in our communications cable factories and product development center.

RESOURCE	REDUCTION 2012 - 2014
Total KWh Electricity	7%
Total Equivalent KWh (All energy sources)	15%
Water	11%

4. Hazardous and Non-Hazardous Waste

The use and generation of hazardous and non-hazardous waste, as defined by the Environmental Protection Agency, can be harmful to the environment. Superior Essex has achieved reductions in both, and continues to explore strategies to further reduce these quantities.

WASTE	REDUCTION 2012 - 2014
Hazardous Waste	18%
Non-Hazardous Waste	33%

D. Sustainability Leadership

Superior Essex is the first in its industry to conduct an independent full Life Cycle Assessment of our high performance copper and optical fiber data cabling products. A Life Cycle Assessment provides a “cradle to grave” view of the environmental impacts of our products including raw materials, manufacturing, transportation, installation, and end of life. We are also the first to publish an Environmental Product Declaration, and Health Product Declaration for these products. Publishing these declarations provides **full disclosure** on the environmental impact and health risks associated with high performance data cabling. The Life Cycle Assessment was conducted by an independent 3rd party, and then validated by Underwriters Laboratories.

1. Life Cycle Assessment (LCA)

Transparency is the clear theme with regards to the future of sustainability. In today's economy, integrating sustainability into products and processes is not enough. Full transparency in manufacturing allows customers to make educated purchasing decisions. As a result, Life Cycle Assessments (LCAs) are an emerging focus in the sustainability marketplace.

Life Cycle Assessments are conducted per ISO-14040/44 standards and are comprised of four phases: goal and scope definition, life cycle inventory, life cycle impact assessment, and interpretation. The LCA is an iterative process and requires an understanding of all inputs and outputs throughout the life cycle. An LCA provides the following range of benefits:

- Satisfy our customer's sustainable supply chain requirements
- A road map to improve the environmental performance of our products
- Evaluation of risks related to raw material dependencies in the supply chain
- Satisfy green building standards (LEED)
- Provide a foundation for developing product stewardship and sustainable product development programs within Superior Essex

The results of the Life Cycle Assessment conducted by Superior Essex have been validated by Underwriters Laboratories.

A Life Cycle Assessment has been completed for 25 high performance copper data cables and 25 high performance optical fiber cables. These products are manufactured in our Hoisington, Kansas and Brownwood, Texas manufacturing facilities.

2. Environmental Product Declaration (EPD)

Superior Essex is the first in the communications cabling industry to have developed Environmental Product Declarations (EPD) as a source of transparent, scientifically based information which discloses the full environmental impact of our high performance copper and fiber optic data cable from cradle to grave. Underwriters Laboratories (UL®) has provided an independent verification of quantitative data in accordance with a standardized methodology - ISO Standard 14025 - so that similar products can be compared objectively. The decision of Superior Essex to publish EPDs with LCA data demonstrates a commitment to transparency and sustainability. We

believe we provide distinct competitive advantage by transparently communicating product impacts, satisfying sustainable supply chain requirements, and contribute to earning LEED credits.

LEED V4, published in November, 2014, allows for data cabling contribution to Materials and Resources credits under “Option 1 - EPD” requiring that:

- 20 permanently installed products sources from at least 5 different manufacturers who meet defined disclosure criteria, **such as an EPD**

EPDs are published for Superior Essex by a recognized program operator, Underwriters Laboratories, and are available for use under LEED V4. If both riser rated and plenum rated Superior Essex copper and optical fiber data cable products are used for a LEED green building project, these products would qualify as 4 of the 20 products required to obtain the Materials and Resources credit. A registry of approved Environmental Product Declarations, including Superior Essex high performance data cabling products, can be found at: www.UL.com/EPD.



3. Health Product Declaration™ (HPD™)

Superior Essex is the first in the communications cabling industry to have developed a Health Product Declarations (HPD) as a source of transparent, scientifically based information which discloses the potential chemicals of concern in products by comparing product ingredients to a wide variety of “hazard” lists published by government authorities and scientific associations. Superior Essex is committed to providing full disclosure of these hazards for our high performance data cabling products.

Designers, specifiers, and owners are increasingly seeking transparent information on the ingredients in building products, and their associated health hazards. Superior Essex has published and provided disclosure on these hazards in accordance with the Health Product Declaration Collaborative Standard. The HPD provided by Superior Essex can be used to obtain a point in the LEED green building certification program.

LEED V4, published in November, 2014, allows for data cabling contribution to Materials and Resources credits under “Option 1 - Material Ingredient Reporting” requiring that:

- 20 permanently installed products sources from at least 5 different manufacturers who meet defined disclosure criteria that define the chemical inventory of a product to 1000 ppm, such as an HPD

Superior Essex has developed HPDs for high performance copper and fiber optic data cabling through a 3rd party according to the Health Product Declaration Collaborative standard, and is available through our website at www.SuperiorEssex.com.

For more information on Health Product Declarations, please visit www.hpdcollaborative.org.



4. Certified Environmental Facts

The Certified Environmental Facts or Multi-Attribute labels include information such as the completion of a Life Cycle Assessment and the publication of an Environmental Product Declaration and Health Product Declaration, as well as water reduction, waste diversion, and carbon footprint reduction. Multi-Attribute certifications are conducted through a credible third-party in accordance with internationally recognized standards (ISO, ASTM, etc.), and the Federal Trade Commission’s Green Guides. This process ensures accuracy and transparency of a manufacturer’s environmental claims as it relates to that product, as well as providing protection from misleading sustainability claims. The Multi-Attribute Label Program was developed by GreenCircle Certified LLC to address Federal Executive Order 13514, which mandates the purchase of sustainable products by all federal purchasers, such as the Department of Defense and GSA. Multi-Attribute Labels/Certified Environmental Facts for Twenty five (25) high performance copper data cables.

Certified Environmental Facts™

Company: Superior Essex®
Products: 10Gain® XP CAT 6A, 10Gain CAT 6A, CAT 6A STP, CAT 6A ScTP, CAT 6+ ScTP, NextGain® CAT 6eX, DataGain® CAT 6+, CAT 6 FEP, CAT 6, CAT 5e+ ScTP, and Marathon LAN® CAT 5e
Packaging: Plywood Reel
Plant Location: Hoisington, KS

Product Specific:

Recyclable Material ¹	24%
Completed LCA/EPD	Yes — Published EPD
Completed HPD	Yes — Published HPD

Packaging Specific:

Pre-Consumer Recycled Content	0%
Post-Consumer Recycled Content	80%
Recyclable Material ²	100%

Manufacturing Specific:

Carbon Footprint Reduction — Facility ³	92%
Reduced Energy Usage	4%
Reduced Water Usage	23%
Reduced Waste ⁴	0.4%
Zero Waste to Landfill Facility ⁵	Yes
ISO 9001:2008 Registered/TL 9000 Registered	Yes

Evaluation Period: 2011 - 2014
Certification Number: 14-0279
Certification Period: 11/1/2014 - 10/31/2015
 For more information on the Certified Environmental Facts of this product, please contact: info@GreenCircleCertified.com
www.GreenCircleCertified.com

1. Pertains to copper wire only. Wire must be stripped to be recycled.
 2. 100% recyclable pending disassembly.
 3. Pertains to Scope 1 emissions only.
 4. Pertains to non-hazardous waste only.
 5. Details on GreenCircle certificate # 15-0238

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Certified Environmental Facts™

Company: Superior Essex®
Products: Cobra CAT 5e+ and Marathon LAN® CAT 5e
Packaging: Reel-in-a-Box
Plant Location: Hoisington, KS

Product Specific:

Recyclable Material ¹	50%
Completed LCA/EPD	Yes — Published EPD
Completed HPD	Yes — Published HPD

Packaging Specific:

Pre-Consumer Recycled Content	41%
Post-Consumer Recycled Content	47%
Recyclable Material ²	100%

Manufacturing Specific:

Carbon Footprint Reduction — Facility ³	92%
Reduced Energy Usage	4%
Reduced Water Usage	23%
Reduced Waste ⁴	0.4%
Zero Waste to Landfill Facility ⁵	Yes
ISO 9001:2008 Registered/TL 9000 Registered	Yes

Evaluation Period: 2011 - 2014
Certification Number: 14-0280
Certification Period: 11/1/2014 - 10/31/2015
 For more information on the Certified Environmental Facts of this product, please contact: info@GreenCircleCertified.com
www.GreenCircleCertified.com

1. Pertains to copper wire only. Wire must be stripped to be recycled.
 2. 100% recyclable in areas with #5 plastic recycling capabilities.
 3. Pertains to Scope 1 emissions only.
 4. Pertains to non-hazardous waste only.
 5. Details on GreenCircle certificate # 15-0238

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Certified Environmental Facts™	
Company: Superior Essex®	
Products: DataGain® CAT 6+, CAT 6, Cobra CAT 5e+, and Marathon LAN® CAT 5e	
Packaging: POP Box	
Plant Location: Hoisington, KS	
Product Specific:	
Recyclable Material ¹	50%
Completed LCA/EPD	Yes — Published EPD
Completed HPD	Yes — Published HPD
Packaging Specific:	
Pre-Consumer Recycled Content	0%
Post-Consumer Recycled Content	60%
Recyclable Material ²	100%
Manufacturing Specific:	
Carbon Footprint Reduction — Facility ³	92%
Reduced Energy Usage	4%
Reduced Water Usage	23%
Reduced Waste ⁴	0.4%
Zero Waste to Landfill Facility ⁵	Yes
ISO 9001:2008 Registered/TL 9000 Registered	Yes
Evaluation Period: 2011 - 2014	
Certification Number: 14-0281	
Certification Period: 11/1/2014 - 10/31/2015	
For more information on the Certified Environmental Facts of this product, please contact: info@GreenCircleCertified.com	
www.GreenCircleCertified.com	
<small>1. Pertains to copper wire only. Wire must be stripped to be recycled. 2. 100% recyclable in areas with #4 and #5 plastic recycling capabilities, pending disassembly. 3. Pertains to Scope 1 emissions only. 4. Pertains to non-hazardous waste only. 5. Details on GreenCircle certificate # 15-0238 © Copyright 2014 by GreenCircle Certified, LLC</small>	

Certified Environmental Facts™	
Company: Superior Essex®	
Products: NextGain® CAT 6eX, DataGain® CAT 6+, CAT 6, and CAT 6 FEP	
Packaging: BrakeBox®	
Plant Location: Hoisington, KS	
Product Specific:	
Recyclable Material ¹	45%
Completed LCA/EPD	Yes — Published EPD
Completed HPD	Yes — Published HPD
Packaging Specific:	
Pre-Consumer Recycled Content	75%
Post-Consumer Recycled Content	25%
Recyclable Material ²	100%
Manufacturing Specific:	
Carbon Footprint Reduction — Facility ³	92%
Reduced Energy Usage	4%
Reduced Water Usage	23%
Reduced Waste ⁴	0.4%
Zero Waste to Landfill Facility ⁵	Yes
ISO 9001:2008 Registered/TL 9000 Registered	Yes
Evaluation Period: 2011 - 2014	
Certification Number: 14-0282	
Certification Period: 11/1/2014 - 10/31/2015	
For more information on the Certified Environmental Facts of this product, please contact: info@GreenCircleCertified.com	
www.GreenCircleCertified.com	
<small>1. Pertains to copper wire only. Wire must be stripped to be recycled. 2. 100% recyclable in areas with #5 plastic recycling capabilities. 3. Pertains to Scope 1 emissions only. 4. Pertains to non-hazardous waste only. 5. Details on GreenCircle certificate # 15-0238 © Copyright 2014 by GreenCircle Certified, LLC</small>	

5. Supporting Memberships, Participation, and Expertise

a) U.S. Green Building Council® (USGBC®)

Superior Essex is a member of the U.S. Green Building Council (USGBC) and its commitment to a prosperous and sustainable future through cost-efficient and energy-saving green buildings.

Superior Essex USGBC Company Profile: www.usgbc.org/node/4742055



b) LEED Accredited Professional (AP) in Building Design and Construction

Superior Essex has a certified LEED AP BD+C on staff in our Atlanta, GA Engineering Services organization. Please contact Technical Support at (877)-263-2818 for assistance with:

- LEED V4 Material and Resource Credits for Superior Essex performance data cabling, including Option 1 – Environmental Product Declaration, and Option 1 – Material Ingredient Reporting

c) TIA Workgroup TR-42.10 - Standards development process of the Sustainable Technology Environments Program (STEP)

Superior Essex is a participating member of this committee, which is chartered to bring sustainability to the process of planning, designing, integrating and operating technology systems.

6. Summary of Environmental Product Certifications

Data Cable Product Type	Description	UL Listing	EPD	HPD	Certified Environmental Facts
Copper	10Gain XP CAT 6A	CMR/CMP	X	X	X
	10Gain CAT 6A	CMR/CMP	X	X	X
	CAT 6A U/FTP (STP)	CMR/CMP	X	X	X
	CAT 6A U/FTP (ScTP)	CMR/CMP	X	X	X
	CAT 6A	CMR/CMP	X	X	X
	CAT 6+ U/FTP (ScTP)	CMR/CMP	X	X	X
	NextGain CAT 6eX	CMR/CMP	X	X	X
	DataGain CAT 6+	CMR/CMP	X	X	X
	CAT 6 with FEP Jacket	CMP	X	X	X
	CAT 6 LSHF	LSHF		X	
	CAT 6	CMR/CMP	X	X	X
	Cobra CAT 5e+	CMR/CMP	X	X	X
	CAT 5e+ U/FTP (ScTP)	CMR/CMP	X	X	X
	Marathon LAN CAT 5e	CMR/CMP	X	X	X
	CAT 3 (2-400 pair)	CMR/CMP		X	
Optical Fiber	Simplex, Duplex, and Quad Interconnect	OFNR/OFNP	X	X	
	Microarray Data Center Interconnect	OFNR/OFNP	X	X	
	2mm Microarray Breakout	OFNP	X	X	
	3mm Microarray Breakout	OFNR/OFNP	X	X	
	3mm Interlock Armored, Microarray Breakout	OFCR/OFCP	X	X	
	Breakout	OFNR	X	X	
	Single Unit Distribution	OFNR/OFNP	X	X	
	Premises Fiber Brakebox	OFNR/OFNP	X	X	
	Multi-Unit Distribution	OFNR/OFNP	X	X	
	Compact and Rugged Indoor MDU	OFNR	X	X	
	Rugged Indoor/Outdoor MDU	OFNR	X	X	
	Indoor/Outdoor Sunlight Resistant	OFNP	X	X	
	Dry Block, Sunlight Resistant Indoor/Outdoor	OFNR/OFNP	X	X	
	Hybrid Premises	OFNR/OFNP	X	X	
	Interlocked Armored, Tight Buffer	OFCR/OFCP	X	X	

E. Environmental Initiatives

1. Landfill Diversion

Superior Essex is committed to the prevention and reduction of generated waste through source reduction, recycling, and reuse. Waste diversion generates environmental, financial, and social benefits, including conserving energy, reducing disposal costs, and reducing the burden on landfills and other waste disposal methods.

In 2014, Superior Essex diverted more than 8.9 million pounds from landfills through recycling or reuse programs.

Our Hoisington, KS production facility is leading the way for Superior Essex by developing state of the art waste stream tracking systems and for actively seeking a recycling, reuse, or incineration outlet for all waste produced by the factory. In 2016, the facility recycles, reuses or sends 100 % of its waste to third-party material management companies, versus landfill, for the purpose of recycling or reuse. The Hoisington facility has conducted 3rd party audits in 2014-15 to validate waste handling processes and downstream material handling and recycling to further validate actual waste diversion from landfill. Superior Essex leveraged these audits to make changes to downstream material management companies, as well as to find recycling, reuse, or incineration outlets for remaining materials going to landfill.

In June, 2015, the Hoisington manufacturing plant was certified to be a “Zero Waste to Landfill” facility by GreenCircle Certified.



2. E-Waste Disposal

Superior Essex employs a Responsible Recycling (R2) vendor for the management of all E-Waste from the Company's corporate office in Atlanta. R2 Vendors ensure that there is downstream management of end of life equipment and materials. E-Waste includes:

- Computer monitors
- Personal computers and laptops
- Cell and smart phones
- Telephones
- Printers
- Disk drives
- Batteries
- Servers
- Audio/visual equipment
- Fax machines
- Electronic cabling and power supplies

Our Information Technology department also organizes an annual e-waste recycling event for employees, where personal e-waste can be collected for recycling.

3. Recycling Programs

Superior Essex recognizes reducing, reusing, and recycling saves money, energy and natural resources. It is part of our environmental strategy to reduce, reuse or recycle wherever possible in order to minimize our impact on the environment.

a) Reel Recycling

Superior Essex ships more than 100,000 wooden reels per year. This recycling program helps reduce the consumption of new wooden reels by up to four million pounds annually. The program also helps to reduce the disposal of empty reels in landfills. Through a refurbishment process, wooden reels can be reused an average of five times before retirement.

This initiative was designed in cooperation with one of the Company's primary wooden reel suppliers, who will collect empty Superior Essex reels from customers at no charge and refurbish the reels in accordance with Company specifications.

b) Internal Recycling

As part of the Environmental Plan, Superior Essex recognizes that recycling or reuse programs are indicative of efficiency and a commitment to reduce environmental impacts. As such, we recycle or reuse wherever possible in our operations.

- Common Recycled/Reused Items
 - » Cardboard
 - » Paper
 - » Wood pallets
 - » Metals
 - » Glass
 - » Plastic
- Special Consideration Recycled/Reused Items
 - » Batteries
 - » Bulbs
 - » Oil
 - » E-waste
 - » Solutions

4. Packaging and Shipping

Superior Essex provides recyclable or reusable packaging across its product lines. Packaging materials include wood and plywood reels, steel reels, cardboard, plastic spools and endplates.

Below is a description of the recyclable or returnable materials and how it is used in our packaging and palletizing.

a) Outside Plant Reels

Superior Essex wooden reels are returnable through Reel Recycling Program described in section F of this document. At end of life, the reels can be recycled. All Superior Essex steel reels are returnable and can be recycled at end of life.

b) Premises Cable Packaging

100% of the packaging materials used for the containment and protection of premises cable products are recyclable. This includes:

- Cardboard Boxes and Components
 - » BrakeBox®, POP™ Box, Reel-in-a-Box, and Knock-out Box
 - » Corner board used in palletizing
- Plastic
 - » Spools (polystyrene)
 - » Tube (HDPE)
 - » End plates (Polypropylene)
- Wood and Plywood Reels
- Plastic Stretch Wrap

c) Environmentally Friendly Packaging Initiatives

- Data cable plastic spools are produced with 100% recycled materials
- All inks and adhesives used on our premises data cable boxes are biodegradable
- All internal box waste is recycled by our box manufacturer for use in future products
- Many of our final product packaging materials, such as wooden pallets, corner boards, spools and boxes are produced with or contain recycled materials

5. Energy Conservation

Superior Essex is committed to the efficient use of energy and conservation of energy in our production facilities.

a) Capital Investment

Energy consumption has been significantly reduced by spending hundreds of thousands of dollars to upgrade motors, compressors, and HVAC systems with energy efficient models that promote more efficient use of energy.

b) Lighting

Superior Essex has reduced annual energy consumption by more than 8 million kWh through the use of highly efficient T5 and T6 fluorescent lighting systems.

6. Product Development

Superior Essex has reduced the amount of material content in a number of our high performance data cables. By using less material, Superior Essex effectively reduces waste at end of life as well as landfill.

F. Substances of Concern

Superior Essex is committed to producing products that are safe for handling and safe for the environment. We continually monitor changes to the RoHS and REACH directives for new substance restrictions. Superior Essex requires that all raw material suppliers certify that their material is compliant with both RoHS 2 and REACH Directives.

1. Restriction of Hazardous Substances (RoHS) — 2 Directive

The Restriction of Hazardous Substances Directive (“RoHS”) is a European directive that restricts the use of six hazardous substances in the manufacture of various types of electronic and electrical equipment. These substances are considered hazardous to the environment, pollute landfills, and are dangerous in terms of occupational exposure during manufacturing and recycling. The six restricted substances are:

- Lead (Pb)
- Mercury (Hg)
- Cadmium (Cd)
- Hexavalent chromium (Cr6+)
- Polybrominated biphenyls (PBB)
- Polybrominated diphenyl ether (PBDE)

The substances may be present incidentally at certain levels as long as they are declared. All applicable products in the EU marketed after July 1, 2006 must pass RoHS compliance. Certain exemptions apply, and these are updated on occasion by the EU. RoHS is closely linked with the Waste Electrical and Electronic Equipment Directive (WEEE) 2002/96/EC which mandates the treatment, recycling and recovery of electrical goods. RoHS regulates the hazardous substances used in electrical and electronic equipment, while WEEE regulates the disposal of the same.

Superior Essex is aware of RoHS and the importance of restricting the use of hazardous substances in its cable products. We are committed to producing products that are safe for the environment. Superior Essex marks all RoHS compliant cables with a RoHS label.

2. REACH Directive

The European Union (EU) adopted a new directive in June 2007 to regulate the use of chemical substances sold into EU countries. This regulation, called Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH), establishes a multi-year program to monitor, control and reduce the use of dangerous chemicals within the EU. The European Chemicals Agency (ECHA) is responsible for managing the program and recommending inclusion of chemicals to the list of Substances of Very High Concern (SVHC). SVHCs are chemical substances that have been judged to have potential negative effects on health or the environment. The SVHC list is periodically updated. A complete listing of all SVHC chemicals can be found on the ECHA website at www.echa.europa.eu.

Products (“articles”) that contain more than 0.1% of substances labeled as SVHC under certain conditions are also of concern. Based on our review of the REACH Directive, our communication cables are considered “articles” under REACH. The primary REACH obligations with respect to articles manufactured outside the EU and subsequently imported into the EU are to provide safe handling instructions to recipients of the articles that contain at least 0.1% of any substance on the SVHC list and to notify the ECHA when articles containing at least 0.1% of any of the substances in the SVHC list are imported into the EU in quantities in excess of certain designated thresholds.

Superior Essex is aware of REACH and the importance of restricting the use of hazardous chemicals in its products. We are committed to producing products that are safe for handling and safe for the environment. As such, Superior Essex has implemented procedures necessary to comply with the evolving REACH requirements as they pertain to communication cables.

3. Technical Support

The Technical support team at Superior Essex can facilitate a response to any question regarding our products in relation to the RoHS - 2 and REACH Directives. Technical Support can be reached by calling: (877)-263-2818 or via e-mail at Comm.TechSupport@spsx.com.

G. Environmental Management System (EMS)

Superior Essex is committed to developing and implementing an environmental policy and objectives that take into account legal and other requirements as well as our significant environmental impacts.

As such, Superior Essex maintains a compliant system to the ISO 14001 standard at each of our manufacturing locations with dedicated resources and corporate support systems. Ongoing verification of the system is maintained by a series of internal and corporate audits in order to continually improve the environmental impact of our operations.

1. EMS Overview

a) Environmental Policy

Superior Essex has a standing environmental policy, prepared in parallel with ISO 14001:2004 format.

b) Environmental Aspects

Superior Essex has completed a formal review of environmental aspects associated with communications cable manufacturing. It was noteworthy that aspects noted during this effort paralleled what had long been points of emphasis for environmental control at the Superior Essex communications cable operations.

c) Legal Requirements

Superior Essex maintains its up-to-date status on legal and other requirements through reliance on both in-house and outside attorneys. In addition, the Superior Essex technical and business staffs maintain relationships within the business of communications cable manufacturing by participation in communications cable industry working committees, a timely and reliable source of information about challenges facing the communications cable industry.

d) Objectives and Targets

Superior Essex expects compliance at a minimum. This mandate is inherently attached to all other considerations (technical, operational, business, etc.).

e) Environmental Management Programs

Superior Essex designates responsibility for environmental management to each SEC facility manager, and the facility manager in turn assigns an environmental coordinator from the engineering staff at the facility. The environmental coordinator maintains a compliance calendar of environmental compliance action items and due dates. The environmental coordinator relies on regulatory and engineering expertise at the Superior Essex corporate and division levels for training and assistance in his/her environmental management duties.

Modifications of a facility, product, service, etc., are considered by facility management and engineering for environmental impact via communication between the facility and corporate and/or division engineering.

f) Structure and Responsibility

In keeping with the bullet immediately above, the Superior Essex facility manager is ultimately responsible for environmental management at a given facility. The facility manager in turn reports to Superior Essex upper management, through various meetings, teleconferences, written reports, spending authorization, etc.

In addition, a corporate engineer with regulatory expertise, serving in a support function at several facilities, maintains a separate reporting relationship with top company management.

g) Training, Awareness, and Competence

Superior Essex establishes minimum level of qualifications and employee training at each Superior Essex facility, to be managed by human resources. Support to HR in this function comes primarily from resources within Superior Essex, including the facility environmental coordinator and/or division and corporate regulatory and engineering expertise.

h) Communication

As noted in an earlier bullet, the Superior Essex facility manager is ultimately responsible for environmental management at a given facility, and the facility manager in turn reports to upper management, through various meetings, teleconferences, written reports, spending authorization, etc. In addition, a corporate engineer with regulatory expertise, serving in a support function at several facilities, maintains a separate reporting relationship with top company management at Superior Essex.

i) Environmental Management System Documentation

At a given Superior Essex facility, the environmental coordinator is primarily responsible for assembling and controlling documents related to environmental management, typically using the quality systems philosophy for control, under guidance from regulatory and engineering expertise at the corporate and division levels.

j) Operational Control

Superior Essex completed a formal review of environmental aspects in communications cable manufacturing. The resulting list of significant

environmental aspects paralleled what had long been points of emphasis for environmental control at the Superior Essex communications cable operations. The aforementioned compliance calendar is maintained up-to-date and then followed to keep control of those significant aspects.

k) Emergency Preparedness and Response

A typical Superior Essex communications cable facility maintains an up-to-date integrated contingency plan, in which potential emergency situations have been considered versus mitigating mechanisms in place, both physical and procedural. Then, procedures for incident response are addressed, ranging from authority to available resources.

l) Monitoring and Measurement

In cases where monitoring is expected as part of environmental management, Superior Essex follows standard procedures for measurement and implements proper quality maintenance for monitoring equipment.

As noted in an earlier bullet, Superior Essex maintains its up-to-date status on legal and other requirements through reliance on both in-house and outside attorneys. In addition, the Superior Essex technical and business staffs maintain relationships within the business of communications cable manufacturing by participation in communications cable industry working committees, a timely and reliable source of information about challenges facing the communications cable industry.

m) Nonconformance and Corrective and Preventive Action

In event of suspected nonconformance, the environmental coordinator reports to the Superior Essex facility manager, and the report is carried to Superior Essex upper management directly by the facility manager. In addition, contact with division and corporate engineers by the environmental coordinator would serve as a separate conduit to top company management via a corporate engineer with regulatory expertise.

Addressing of a genuine nonconformance will be the responsibility of facility management, in cooperation with corporate and division engineering.

n) Records

As noted in an earlier bullet, the environmental coordinator is primarily responsible for assembling and controlling documents related to environmental management at a given Superior Essex facility, typically using the quality systems philosophy for control, under guidance from regulatory and engineering expertise at the corporate and division levels.

o) Environmental Management System Audit

Audits of a given Superior Essex facility are conducted on ad-hoc basis by regulatory and engineering expertise at Superior Essex corporate and division levels. These audits are conducted with the cooperation of the facility environmental coordinator, and results are shared with facility management.

p) **Management Review**

The mechanism for management review of Superior Essex EMS rests with a corporate engineer with regulatory expertise, serving in a support function at several facilities, as this engineer maintains a separate reporting relationship with top company management at Superior Essex.

II. Corporate Social Responsibility

A. Business Code of Ethics

Superior Essex has earned the reputation of a company with the highest integrity — producing and delivering quality products with outstanding customer service. We are not only proud of what we are accomplishing, but of how we are achieving success. This reputation is one we want to protect. To protect this reputation, we continually strive to

serve the best interests of our customers, employees and shareholders, while behaving as a responsible corporate citizen. This commitment requires, among other things, that we act with the highest ethical and legal standards.

Our commitment to the highest standards of integrity begins with ensuring that everyone across the Superior Essex organization understands our core values — values that define how we conduct ourselves. These values are the foundation of our **Code of Ethics**.

1. The Code of Ethics

The Company is committed to competing both lawfully and ethically in the marketplace. We are honest and fair in all our business dealings with customers, suppliers and business vendors.

- We never use unlawful or unethical means to learn about our competitors, and we gather business intelligence in a proper and lawful manner
- We market and sell our products with honesty and integrity, and in compliance with all applicable laws
- We compete in compliance with all applicable antitrust and competition laws

B. Supply Chain

1. Supplier Code of Conduct

Superior Essex Inc. and its subsidiaries and affiliated companies (the “Company”) are committed to conducting business with the highest ethical and legal standards, respecting the rights of all individuals and the environment. The Company expects its suppliers to share this same commitment. The following standards establish the minimum requirements for doing business with the Company. We strongly encourage each supplier, vendor, contractor, consultant, agent and any other provider of goods or services who does, or seeks to do, business with the Company (each, a “Supplier”) to meet or exceed these standards in activities that relate directly or indirectly to the Company.

- Commitment to Law
- Non-Harassment and Non-Discrimination
- Compensation and Work Hour Regulatory Compliance
- Forced Labor and Child Labor
- Workplace Safety
- Environmental Protection
- Unfair Competition and Anti-Corruption
- Conflicts of Interest
- Confidentiality

C. People and Community

Superior Essex International LP, as part of Superior Essex Inc., employs over 1,000 people throughout North America. Through teamwork and a commitment to quality and unparalleled customer service our employees have helped make us one of the largest manufacturers of wire and cable products in the world.

Teamwork defines our success at Superior Essex and we recognize the special talents each member brings to our team. That's why at Superior Essex we reward our employees with competitive pay and benefits, state-of-the-art technology and opportunities for development and advancement.

1. Community Involvement and Outreach

Superior Essex prides itself on our strong commitment to giving back to the communities in which we live and work as well as those that need our help the most. Through our colleague's hard work and generous support, we have been able to make an impact to many organizations. Employees of Superior Essex Inc. took full advantage of the Matching Gifts program offered through the company. In recent years, employee donations and Superior Essex matching contributions provided assistance to 80 different organizations. Most notably, these contributions have supported The Woodruff Arts Center, Alliance Theater, Junior Achievement, Boy Scouts of America, Public Broadcasting, Children's Healthcare of Atlanta, Carl E. Sanders YMCA at Buckhead, The Leukemia and Lymphoma Society and Forward Atlanta.

2. Highlighted Community Participation:

a) Special Olympics

For the past 12 years, Superior Essex has supported Special Olympics of Georgia Winter Games. Contributions include corporate sponsorship of the program, board membership, as well as significant employee participation during the event.

b) Disaster Relief / American Red Cross®

Superior Essex and its employees have contributed donations and matching funds for four recent disaster relief efforts in the United States (Hurricane Sandy, The China Earthquake, Haitian Relief and the Oklahoma tornado disaster). In addition to the monetary assistance, Superior Essex also held blood drives in association with the Hurricane Sandy relief efforts.

c) The Salvation Army® Angel Tree

Superior Essex participates in the annual Salvation Army Angel Tree program that provides needed toys for families in the Atlanta area during the holiday season.

Combined donations of time and toys by the company and its employees resulted in the program achieving a 20% increase in families served through the program.

3. Employee Wellness

Superior Essex seeks to engage our employees in an active, healthy, productive lifestyle. Our desire is to help our employees create a work environment that supports a healthy lifestyle and increases quality of life.

Our ongoing “Wired for Wellness” program helps promote these values in the following ways:

- Health Coaching
- Health and Wellness Challenges
- Onsite Biometric Screenings
- Smoking Cessation
- Healthcare cost reductions based on participation

Superior Essex employees also take part in National and local fitness challenges, most notably the National Bike Challenge. In 2014, Superior Essex employees pedaled a total of 17,229 miles in support of this challenge.



D. Employee Health and Safety

1. Superior Essex Safety Optimization Plan

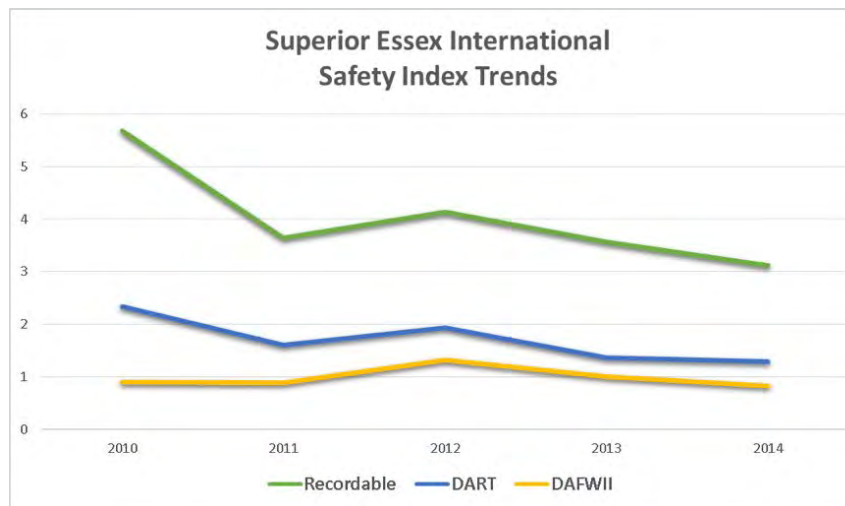
The goal of Superior Essex is to eliminate or control both known and potential safety and health hazards. Our plan to do so is in accordance with the following guiding principles:

- Maintaining a safe and healthful work environment is not just an idea — it is our top priority
- Safety and health are a shared responsibility. Each and every employee must take ownership of his or her own safety and that of coworkers
- It is everyone’s job to spot hazards and to correct them or report them in a timely manner. Every accident or injury shall be reported immediately

- Where hazards cannot be completely eliminated, they must be reduced through engineering or administrative controls or, as a final precaution, through the proper use of personal protective equipment
- Every individual will be trained to perform work safely. If an individual feels inadequately trained to perform a certain procedure, he or she is required to discuss the issue with supervision
- As a condition of continued employment, each employee must consistently work in a safe manner

Superior Essex is committed to providing ongoing training and awareness regarding safety, making all employees (including top management) aware of our safety performance, and recognizing significant safety achievement

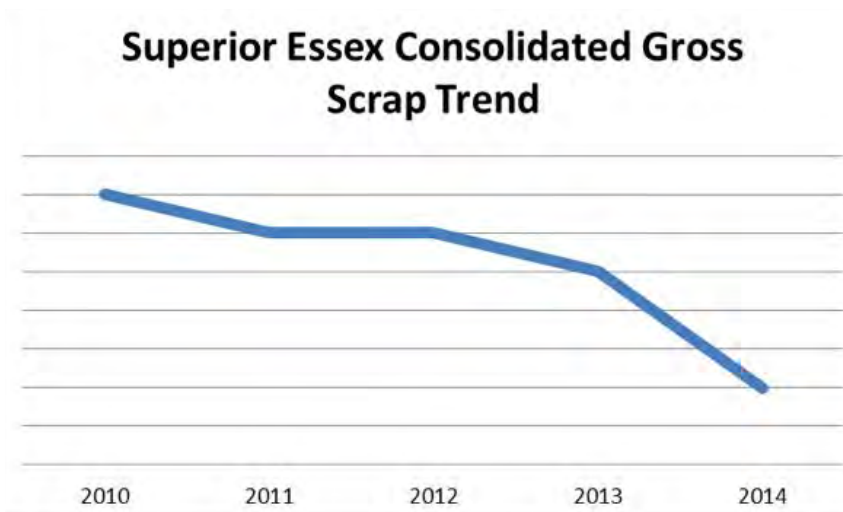
Since 2010, implementation of the Superior Essex Safety Optimization Plan has resulted in significant reductions in our Recordable Incident Rate (-39%), as well as "OSHA DART" (-45%) and "DAFWII" (-8%) lost time safety measures.



III. Operations and Supply Chain

A. Optimization of Manufacturing Processes/Process Modernization

Superior Essex has committed significant capital along with investments in research and development over the past 4 years towards the modernization of equipment, process improvements, and sustainable product development. Along with significant improvements in material usage, considerable gross scrap reductions of 7% have been achieved during the period 2010-2014. Gross scrap is the amount of actual scrap generated prior to any recovery. The following trend chart demonstrates improvements in gross scrap consolidated across our operations.



B. Inventory and Supply Chain Management

Superior Essex supports and implements effective inventory and supply chain management processes in order to improve efficiency and customer service, as well as minimize environmental impacts and reduce waste through the improved execution of upstream and downstream material flows required to manufacture products and service our customers.

1. Professional Certifications and Associations

The Supply Chain organization at Superior Essex maintains memberships and active involvement in the Institute for Supply Chain Management®, or ISM®, (www.ism.ws) and the Council of Supply Chain Management Professionals (www.cscmp.org). Staff certification as a Certified Professional in Supply Chain Management® (CPSM®) is also encouraged and maintained in order to ensure a solid foundation in theory and practice of inventory and supply chain management principles.

2. Lean Manufacturing Principles

Lean manufacturing is a business model and collection of tactical methods that emphasize eliminating non-value added activities (waste) while delivering quality products on time at least cost with greater efficiency. Superior Essex has deployed the principles of LEAN throughout its operation, and has conducted significant numbers of KAIZEN events in order to remove wasteful effort from our manufacturing processes.

According to the United States Environmental Protection Agency (EPA), lean principles

“Drive rapid, continual improvement in cost, quality, service, and delivery, significant environmental benefits typically “ride the coattails” or occur incidentally as a result of these production-focused efforts. Lean production techniques often create a culture of continuous improvement, employee empowerment, and waste minimization, which is very compatible with

organizational characteristics encouraged under environmental management systems (EMS) and pollution prevention.”

3. Six Sigma Approach

Six Sigma consists of a set of statistical methods for systemically analyzing processes to reduce process variation, which are used to support and guide key continuous improvement activities at Superior Essex. Six Sigma’s toolbox of statistical process control and analytical techniques are being used to assess key process quality and waste areas to which other lean methods can be applied as solutions. Superior Essex has a number of strategically located Six Sigma “Black Belts” throughout its operations to lead these efforts.

According to the EPA, the Six Sigma approach has implications for environmental impacts

“By removing variation from production processes, fewer defects inherently result. A reduction in defects can, in turn, help eliminate waste from processes in three fundamental ways:

- Fewer defects decreases the number of products that must be scrapped
- Fewer defects also means that the raw materials, energy, and resulting waste associated with the scrap are eliminated
- Fewer defects decrease the amount of energy, raw material, and wastes that are used or generated to fix defective products that can be re-worked”

IV. Quality Assurance

A. ISO 9001 / TL 9000 Quality Management Systems

Superior Essex maintains a strong foundation in quality management systems, demonstrated through our commitment to 3rd party independent registrations. Each Superior Essex manufacturing facility for communications products has implemented a strict system of processes and procedures that comply with the TL 9000 and ISO 9001 Quality Management Systems, ensuring that we continuously improving our standard of quality for your telecom products.



QUALITY SYSTEMS REGISTRARS

AMERICA'S FIRST ACCREDITED REGISTRAR IN THE UNITED STATES

Superior Essex maintains registration of our Quality Management System through Quality Systems Registrars (QSR®). Semi-annual surveillance is conducted of the quality systems in each manufacturing facility, ensuring ongoing compliance.



The TL 9000 Quality Management System is built on ISO 9001 and the eight quality principles, but designed specifically for the communications industry. The purpose of TL 9000 is to define the unique communications quality system requirements for design, development, production, delivery, and service. Superior Essex established a leadership position by becoming a founding member of the QuEST Forum in 1998, charged with developing the standard, and also by our Brownwood, TX facility achieving the first copper cable plant certification in September of 2000. All Superior Essex facilities supplying the telecom market are TL 9000 certified.

All other Superior Essex manufacturing locations serving other markets, such as energy, are ISO 9001 certified for their Quality Management System.

For more information on TL 9000 and ISO 9001 Quality Management Systems, please see: www.questforum.org or www.iso.org.

The following are the registration certificates for our manufacturing facilities, located in Brownwood, TX, Hoisington, KS, and Tarboro, NC:

1. Brownwood, TX Registrations



2. Hoisington, KS Registrations



B. Third Party Quality Assurance Program Participation

Superior Essex is committed to producing high quality products that result in long product lifespan and contribute to the overall sustainability of telecommunications systems. Third party quality assurance testing validates our commitment to the quality of our products.

High performance data cable verifications and listings provide confidence to our customers that we consistently meet or exceed ANSI/TIA-568-C.2 electrical performance as well as UL physical and fire safety characteristics.

All Superior Essex high performance 4-pair premises data cabling, from CAT 5 to CAT 6A, are verified by a Nationally Recognized Test Lab (NRTL), such as Underwriters Laboratories.

All Superior Essex voice and data cabling, both copper and fiber optic intended for indoor or indoor/outdoor applications, are listed to the appropriate UL fire safety rating. Included in these listings are cable applications for plenum spaces (CMP), riser spaces (CMR), and other indoor or indoor/outdoor general configurations (CMR/CMX, CM). Rigorous follow-up testing is conducted by the NRTL to ensure continued compliance.

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