



## GLOBAL CONFLICT MINERAL POLICY

EFFECTIVE APRIL 22, 2016

### Background

Pursuant to Section 1502 of the Dodd-Frank Act, the U.S. Securities and Exchange Commission (“SEC”) adopted rules which impose diligence and disclosure requirements on reporting companies that manufacture or contract to manufacture products for which Conflict Minerals are necessary to the products' functionality or production (the “SEC Rules”). The “Conflict Minerals” of concern currently include cassiterite (used to produce tin), columbite-tantalite (used to produce tantalum); wolframite (used to produce tungsten), and gold (also known together as “3TG”), regardless of where they are sourced, processed or sold.

The sale of these minerals is believed to be partially funding armed groups that are committing human rights abuses and contributing to conflict in the Democratic Republic of the Congo (DRC) and adjoining countries<sup>1</sup> (collectively referred to as the “Covered Countries”). The intent of the SEC Rules is to reduce this source of funding. The SEC Rules and this policy apply to General Cable Corporation and all of its wholly-owned subsidiaries and controlled affiliates.

### Commitment

General Cable strives to avoid the use of Conflict Minerals sourced from entities which directly or indirectly finance conflict in the Covered Countries. General Cable generally does not purchase Conflict Minerals directly from smelters and mines, and accordingly, General Cable must rely on its suppliers to provide sourcing information for these minerals. If we discover through our supplier due diligence that products we have procured contain Conflict Minerals that were sourced from smelters that are not verified “conflict-free” facilities, we will take reasonable steps to address the situation, including reassessing the supplier relationship, and, where commercially feasible, transitioning to alternative sourcing arrangements.

We also intend to fully comply with the requirements of the SEC Rules, which require us to perform due diligence into the sources of Conflict Minerals supplied to us and disclose the results of such diligence. Accordingly, we will work with applicable suppliers to perform the necessary due diligence and determine the potential for Conflict Minerals in their supply chain and the products or materials they sell to us. Our due diligence program will be designed in accordance with the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (available at <http://www.oecd.org/daf/inv/mne/mining.htm>)

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<sup>1</sup> DRC's adjoining countries presently include: Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

## Expectations of Suppliers

We expect that applicable suppliers will cooperate with our due diligence efforts in support of our Conflict Minerals commitment and otherwise assist us in complying with the SEC Rules by:

- Establishing their own Conflict Minerals policies and procedures in accordance with the SEC Rules;
- Performing sufficient due diligence into their respective supply chains to determine whether products sold to us contain Conflict Minerals and, if so, whether and to what extent those metals are sourced from conflict-free smelters;
- Reporting to us, in the manner and form specified by us, the results of such due diligence, including identification of the materials or products sold to us and the smelters that produced the relevant Conflict Minerals. Our direct suppliers may have to require successive upstream suppliers to complete the same due diligence until the smelters are identified;
- Committing to being or becoming “conflict-free” so that any Conflict Minerals supplied to us are sourced only from conflict-free smelters;
- Providing information upon request to support our SEC reporting requirements; and
- Upon request, provide information to support our SEC reporting requirements and permit their Conflict Minerals policies and procedures to be audited by us or our representatives.

If a supplier is unwilling to support us in our Conflict Mineral program efforts, we may take remediation steps, up to and including alternative sourcing arrangements. We may also take remediation steps if a supplier cannot determine whether its materials or products contain Conflict Minerals.

To direct any concerns about this policy or our supply chain, or to report a potential violation of this policy, contact **ConflictMinerals@generalcable.com**.