

**SUPERIOR ESSEX INC.
ENVIRONMENTAL POLICY**

GENERAL AND BACKGROUND:

Superior Essex is a global leader in the design, manufacture and supply of wire and cable products. We are the world's largest producer of magnet wire, also known as winding wire, an insulated copper or aluminum conductor used by major original equipment manufacturers and distributors. In North America, we are the industry leader in outside plant copper communications wire and cable products. We also manufacture and supply fiber optic cables and premises copper cables.

Superior Essex operates over 25 manufacturing facilities in the United States, Canada, Mexico, France, Germany, Italy, the United Kingdom, Portugal and China. We have more than 4,500 employees working around the world to supply the quality products that are essential to the operation of a wide variety of everyday household items and critical to day-to-day business operations.

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. This Environmental Policy embodies this commitment to the environment, health and safety and provides guidance to implement its commitment.

SCOPE:

As used herein, "Superior Essex" or "the Company" refers to Superior Essex Inc. and all of its operating companies worldwide. All employees in each location and every department 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.

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.

OBJECTIVES:

In furtherance of this policy, the Company will:

- Conduct its operations in full compliance with applicable federal, state and local laws and regulations, and in a manner which seeks to minimize the threat of harm or injury to human health or the environment.
- Maintain current awareness of environmental laws, regulations, policies and control technology.
- Cooperate with governmental authorities in the exercise of their responsibilities for pollution control, and support the development of sound, equitable, and realistic environmental standards, laws and regulations.
- Strive to prevent pollution at the source through continual improvement programs.

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- Include consideration and review of potential environmental impacts of its operations and changes to its operations.
- Disseminate this Environmental Policy to all business units and maintain systems to establish management responsibility and control necessary for its implementation.
- Continue the practices and procedures necessary to implement the spirit as well as the letter of this Environmental Policy.
- Annually review the effectiveness of environmental protection activities at the facilities and operations of the Company.
- Report to senior management the status of its environmental protection and improvement programs, and any material intrusions upon the environment which occur or are threatened from the operations of the Company in accordance with Company policies and procedures.
- Strive to recycle and reuse materials where possible and to conserve energy and other resources.

CODES OF PRACTICE:

In order to uphold our commitment to the environment, the following codes of practice shall be followed:

- **Programs and Procedures-** Each business unit and each facility shall establish and implement goals, programs, and procedures in order to:
 1. conduct operations safely and in an environmentally responsible manner;
 2. ensure conformance with all applicable and relevant EHS laws, Company policies, and requirements; and
 3. tie the function's and facility's performance to corporate and division EHS goals and objectives.

An environmental compliance officer shall be identified for each business unit and facility and shall have the responsibility to ensure the effective implementation of these programs and procedures.

- **Integrated Management-** Each business unit and facility shall integrate EHS programs and procedures into its business activities, as appropriate.
- **Continual Improvement-** Each business unit and facility shall ensure that Company operations are periodically evaluated, and continuously improved, to enhance worker health, safety, and environmental protection. Evaluations shall take into consideration technical developments, recognized EHS best practices, current scientific understanding, and expectations of customers, local communities, and other stakeholders.
- **Employee Education-** Each business unit and facility shall educate, train, and motivate employees to conduct their activities safely and in an environmentally responsible manner. Employee training shall be appropriate to fulfill each employee's EHS-related responsibilities and to comply with applicable EHS requirements.
- **Acquisitions and Divestitures-** Each business unit and facility shall identify EHS impacts and evaluate potential risks and liabilities for all acquisitions, divestitures, and joint ventures.