



SUPPLIER CODE OF CONDUCT - PROCUREMENT POLICY

I. Preface

WireCo WorldGroup Inc. and its subsidiaries, affiliates and controlled companies (collectively, the “Company”) is committed to honesty and integrity with respect to our business conduct towards employees, customers, suppliers, competitors and other stakeholders. This Supplier Code of Conduct (hereinafter referred to as “Supplier Code”) highlights important standards that are consistent with the Company’s company values and to which each supplier of the Company must strictly adhere.

II. The Rules

1. Application

This Supplier Code applies to any and all suppliers, consultants, vendors, brokers, dealers, contractors, agents and other providers of goods and services to the Company worldwide (hereinafter referred to as “Supplier”). The Company recognizes that legal and cultural requirements vary in a global market. The Company expects all of its suppliers to act with the same fairness, honesty and responsibility in all aspects of their business.

2. Compliance with the Supplier Code

The Supplier acknowledges and agrees to comply with the standards of the Supplier Code which is an integral component of the business relationship between the Supplier and the Company and mandatory for the Supplier. The Supplier will be familiar with the business practices of its suppliers and sub-contractors and will require all such suppliers and sub-contractors to comply with this Supplier Code. To clarify any issues relating to the Supplier Code, the Supplier will contact the Procurement Department of the Company.

3. Compliance with Laws, Rules and Legal Regulations

The Supplier will comply with any and all applicable laws, rules and legal regulations in the countries in which it operates and will maintain a system to monitor compliance with such laws, rules and legal regulations.

4. Respect for Human Rights

The Supplier will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labor Organization (ILO), including, but not limited to, the prohibition of forced or child labor, and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws. The Supplier will maintain an environment with no retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law.

5. Antitrust and Competition Law Compliance

The Supplier will strictly comply with all applicable antitrust laws, trade practice laws and any other laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers. The Supplier will not enter into agreements with competitors and other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.

6. Anti-Corruption

The Supplier will comply with applicable laws and regulations concerning anti-corruption, including those concerning foreign corrupt practices. The Supplier will not engage in nor tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official for the purpose of influencing the decision-making process whether or not in violation of applicable laws. The Supplier will never offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, incentives, gifts, entertainment, favors or other benefit of a value in exchange for business opportunities with or in any way related to the business operations of the Company.

7. Product Safety, Health, and Environment

The Supplier will be committed to manufacture and deliver safe products to the Company and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the Supplier's employees. The Supplier will comply with applicable laws and regulations on environmental protection and will preserve resources and protect the environment to the fullest extent possible. Suppliers shall ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges, and take steps to prevent and mitigate accidental spills and releases to the environment.

8. Sustainability

Suppliers shall reduce their environmental footprint through minimizing their use of natural resources and the environmental impact of their activities.

9. Conflict Minerals

"Conflict Minerals" refer to cassiterite, columbite-tantalite (colton), gold and wolframite, as well as their derivatives, which are presently limited to tin, tantalum and tungsten. These are sometimes referred to as 3TG (tin, tungsten, tantalum and gold). The Company has adopted a Conflict Minerals Policy establishing its policy with regards to Conflict Minerals in its supply chain. To support this policy, suppliers must promptly notify the Company if the products or materials they supply to the Company contain Conflict Minerals. Regardless of whether or not the Company receives any notice from the supplier, the Company may require some suppliers to take some or all of the following actions:

- commit to the identification, reduction and ultimate elimination of use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) and nine adjoining countries (the Covered Countries);

- work with their own upstream suppliers and supply chain to conduct due diligence to determine the source and chain of custody, of Conflict Minerals that are contained in products or materials supplied to the Company;
- establish their own policies, due diligence frameworks and management systems for the traceability of Conflict Minerals, and communicate an expectation to their suppliers that they do the same; and
- cooperate with the Company in its efforts to comply with any applicable reporting requirements, including providing timely responses to the Company's inquiries regarding the origin and chain of custody of Conflict Minerals in products or materials supplied to the Company (including the smelter, country of origin, mine location and status) and, upon request, adequate verification of such information.

10. Data Protection, Confidential Information and Intellectual Property

The Supplier will comply with all applicable laws concerning data protection. It is the Supplier's responsibility to ensure that any confidential business information or trade secrets gained by virtue of the business activities with the Company (hereinafter referred to as "Confidential Information") is held in strict confidence and not improperly used or disclosed to third parties. Furthermore, the Supplier will protect and secure the Company's intellectual property as Confidential Information.

11. Export and Import Regulations

Suppliers will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

12. Violations of the Supplier Code

The provisions of this Supplier Code are essential for the business relationship between the Company and the Supplier. Therefore, if the Supplier does not comply with the Supplier Code, the Company reserves the right to terminate the business relationship with the Supplier immediately, subject to applicable laws.