

ADC TELECOMMUNICATIONS, INC.

Business Conduct Policy

TITLE: GLOBAL SAFETY AND ENVIRONMENTAL BUSINESS CONDUCT

POLICY:

It is the policy of ADC to provide safe and healthful working conditions for its employees and visitors and to maintain a management system that integrates sound business practices which promotes the protection and preservation of the environment. The Company is committed to conducting business in an ethical and socially responsible manner.

The Company seeks a healthful and safe workplace, free of occupational injury and illness. The Company emphasizes individual responsibility for safety by all employees and at all levels of management. The Company expects employees to report potential safety hazards and environmental issues and be involved in implementing solutions. The Company will not conduct any operations or market a product without adequate safeguards.

The Company will conduct its business activity in compliance with all applicable safety and environmental laws and regulations. The Company will, at a minimum, meet the requirements of all applicable safety and environmental laws and regulations.

Managers and supervisors will be accountable for the safety and actions of the employees working under their supervision, and will be expected to conduct operations in a safe and lawful manner at all times. It is management's responsibility to ensure that every employee understands and is responsible and accountable for incorporating safety and environmental considerations in daily business activities.

The Company is committed to waste minimization and continuous improvement in all activities with focus on pollution prevention, and will incorporate these principles when defining project specifications and in conducting its business operations.

Periodic reviews will be performed on Company facilities to ensure compliance with established policies, procedures and applicable laws and regulations.

PURPOSE:

The purpose of this Policy is to help ensure that the Company complies with, and that employees are aware of, applicable safety and environmental requirements.

SCOPE:

This Policy applies to every employee of ADC, except to the extent this Policy conflicts with an obligation of the Company under applicable law.

REQUIREMENTS and ILLUSTRATIONS:

1. Environmental Protection:

It is Company Policy to comply with applicable environmental laws, including U.S. environmental requirements and/or local environmental requirements, whichever is the higher standard.

Each Company facility should have a manager who is charged with responsibility for compliance with safety and environmental standards. The ADC Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A. is available as a resource to all Company facilities.

Illustration #1—Hazardous Substances: It is Company policy to treat, store, transport and dispose of hazardous substances in full compliance with all applicable laws. If an employee does not know whether a substance is hazardous, he or she should contact the facility manager, the Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A., or an ADC attorney. The following are examples of **inappropriate** treatment, storage, or disposal of hazardous substances:

- Land disposal of hazardous substances (unless approved by the ADC Director of Loss Prevention and Control and an ADC attorney);
- Placing hazardous substances in any garbage can or dumpster;
- Pouring any unauthorized hazardous substances into a drain, sink, or toilet or down any sewer system;
- Allowing any person, including customers, to leave any unauthorized hazardous substances on any portion of any Company property; or
- The placement of hazardous substances in a container other than the one provided or in a container that is not properly labeled in accordance with instructions provided.

If a release of hazardous substances or petroleum products occurs, employees should attempt, only if completely safe and practical, to contain and recover the materials. If there is any doubt as to whether containment and recovery by the employee is safe, the employee should not attempt such an action. Employees must also report the release or spill of any hazardous substances or petroleum products to the facility manager, ADC's Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A. and an ADC attorney. As required, the ADC Director of Loss Prevention and Control will notify appropriate government authorities of certain releases or spills. If an emergency exists, employees should contact the local fire department or appropriate emergency services.

Illustration #2 - Underground and Aboveground Storage Tanks:

Underground storage tanks (USTs) and aboveground storage tanks (ASTs) can pose significant environmental concerns. All USTs and most ASTs must be registered with the appropriate governmental agency. In addition, tank systems and procedures must be in place to prevent and detect tank overfills, leaks and releases. It is the policy of the Company to comply with applicable legal requirements for USTs and ASTs.

Illustration # 3 - Water Pollution:

Environmental laws of certain countries, including the U.S., regulate the discharge of wastes and other materials into private and public waters, as well as lakes, rivers and streams. Waters generally includes wetlands, storm sewers and sanitary sewers, in addition to lakes, rivers and streams. In virtually all circumstances, permits are required for the discharge of wastes or other materials into waters. It is Company policy to comply with all permit requirements and effluent standards and limitations. Questions regarding the need for or compliance with a water-related permit should be directed to ADC's Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A., or an ADC attorney.

Illustration # 4 - Air Pollution:

Environmental laws of certain countries, including the U.S., regulate and limit emissions of pollution into the air. It is the policy of the Company to comply with all of these laws, especially those that relate to air quality permits.

Illustration # 5 - Conservation of Energy and Natural Resources Policy:

It is the policy of the Company to conserve energy and natural resources by utilizing energy-efficient facilities, equipment and transportation and by providing services and products created and utilized with the minimum of natural resources.

2. Safety:

Providing a safe working environment and complying with government safety regulations is important to the Company. The Company depends on every employee to help in this endeavor by taking a proactive, common sense approach to safety. By observing safe work practices, employees can help identify and eliminate potential hazards or preventable injuries. Employees must report any unsafe condition or work injury to their supervisor immediately. Employees must follow applicable safety rules in their work locations.

3. Training:

Each Company facility must implement and maintain training programs for all employees on matters of workplace safety and environmental practices. For assistance, contact the ADC Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A.

4. Government Investigations:

Employees may be approached by government investigators or regulators requesting information about or seeking to inspect the Company's facilities. Employees must immediately inform an ADC attorney and the Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A. of all government written complaints and inquiries (whether formal or informal), and must not respond to those complaints and inquiries before receiving instruction to do so by an ADC attorney. If a government inspector appears at a Company facility, the facility manager should contact the Director of Loss Prevention and Control (952-917-0462) in Minnesota U.S.A., or an ADC attorney before the inspection occurs. If the facility manager is not able to contact the ADC Director of Loss Prevention and Control or an ADC attorney due to time zone differences, then the facility manager must contact the Director of Loss Prevention and Control or an ADC attorney on the next business day. See Disclosure of Information to the Public, the Media, Analysts, and the Government Business Conduct Policy.

5. Accurate Records and Reporting:

The Company will prepare, maintain and file with the appropriate regulatory authorities accurate and complete environmental permit applications, reports, plans, records, manifests, certifications and other environmental documents. The Company must post required safety and environmental notices as required by applicable law. It is a violation of Company policy to alter, destroy, conceal, falsify or fail to file documents required under applicable safety and environmental laws. Employees who become aware of false or omitted material information in documents filed with a regulatory authority or the destruction or concealment of environmental documents should contact an ADC attorney.

For further information on U.S. standards, review the Safety and Environmental policies located on ADC Broadway, under the category, "Corporate Center/Worldwide Operations/Corporate Services/Safety & Environmental."

The above REQUIREMENTS and ILLUSTRATIONS are illustrative and by no means intended to be complete. To the extent an employee has any further questions, he or she should contact the ADC Director of Loss Prevention and Control, an ADC attorney, or a member of ADC's Business Conduct Committee.

OTHER BUSINESS CONDUCT POLICY REFERENCES:

Accurate Books and Records and Record Retention Business Conduct Policy

Disclosure of Information to the Public, the Media, Analysts, and the Government Business Conduct Policy