

2020 Modern Slavery Act Statement



**Introduction**

This statement is intended to meet CommScope’s reporting obligations under the U.K. Modern Slavery Act (2015) and Australian Modern Slavery Act 2018 (Cth) . This statement describes our efforts to address modern slavery and covers CommScope’s consolidated business, including all wholly owned and controlled subsidiaries. Unless otherwise noted, all information and data in this statement pertains to activities that transpired between January 1, 2020 and December 31, 2020 (fiscal year).

**Reporting Entity**

We choose to provide a joint statement with regard to modern slavery because all CommScope entities around the world use the same policies and processes, operate in the same sector (telecommunications network infrastructure), and have many shared suppliers.

**Reporting Entity’s Structure, Operations and Supply Chains**

**CommScope Structure**

All reporting legal entities are indirectly 100% owned by CommScope Holding Company, Inc. the ultimate parent company of the CommScope group. CommScope Holding Company, Inc. is a publicly-traded corporation trading on NASDAQ under the ticker symbol “COMM”.

CommScope’s global headquarters is located in Hickory, NC, U.S. The company’s products are sold in 190 countries. It has over 100 established manufacturing, administration and research & development (R&D) facilities and distribution centers around the world including Australia, Argentina, Belgium, Brazil, China, Colombia, Czech Republic, France, Germany, India, Ireland, Israel, Italy, Japan, Mexico, Singapore, Spain, Sweden, United Kingdom and the United States.

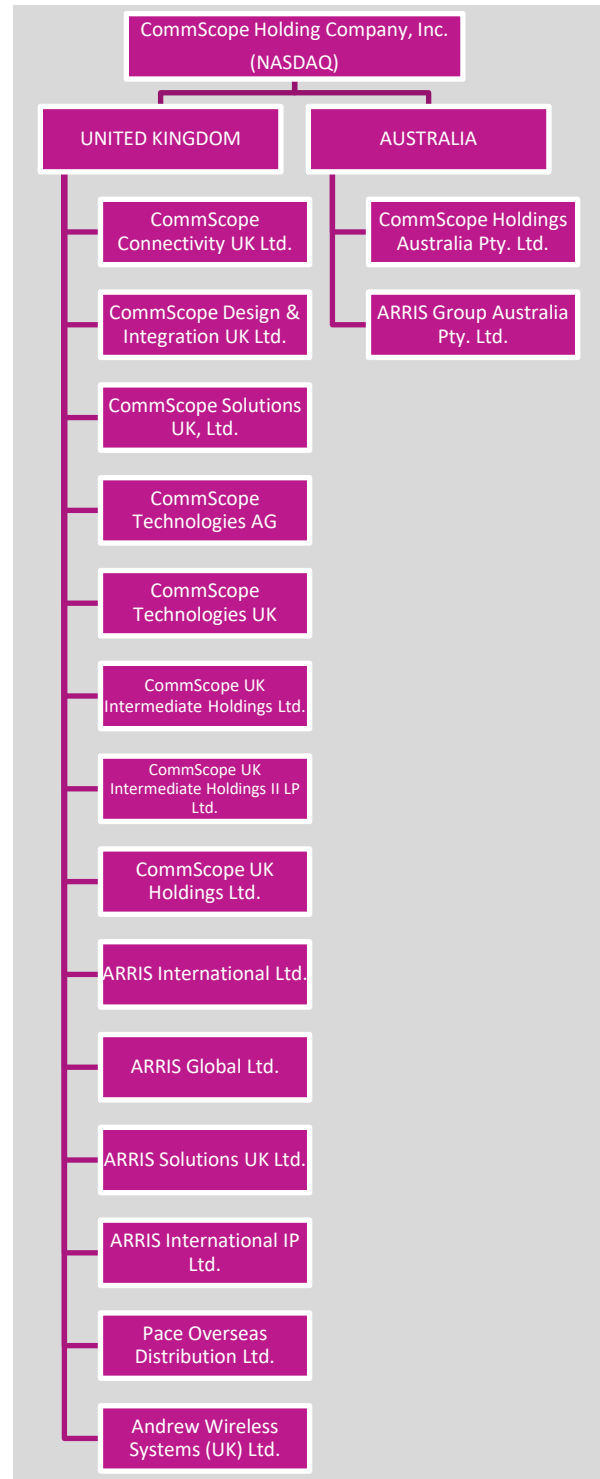
CommScope helps design, build and manage wired and wireless networks around the world. As a communications infrastructure leader, we shape the always-on networks of tomorrow. For more than 40 years, our global team of more than 30,000 employees, innovators and technologists have empowered customers to anticipate what’s next and push the boundaries of what’s possible.

**CommScope Operations**

To support our goal of shaping the most advanced networks of the future, we announced a realignment of our operating structure that became effective in January 2020. Based on this operating structure, our segments are

Venue and Campus Networks, Broadband Networks, Outdoor Wireless Networks and Home Networks.

**Simplified structure of CommScope reporting entities covered by this statement.**



### **CommScope Supply Chain**

CommScope's supply chain is the backbone of our business. We work with thousands of partners across the globe to help ensure we have a diverse, secure, safe, transparent and fair supply of raw materials and components. Even during the COVID-19 pandemic, we've maintained continuity in our supply chain to continue delivering our essential technology.

The principal raw materials and components we purchase are comprised of metals such as copper, steel, aluminum and brass; plastics and other polymers; and optical fiber. This includes circuit boards and other electronic components. We use fabricated copper, steel and aluminum to produce antennas, coaxial and twisted pair cables, and polymers to insulate and protect cables. Significant volatility in global demand, supply disruptions and other factors affect these materials. We optimize our global manufacturing and distribution footprint to help us respond quickly to rapidly changing market conditions, while maintaining a reliable and responsible supply chain supported by a wide variety of expertise. To do so, we continue to enhance our existing supplier selection, risk assessment and performance evaluation processes.

CommScope sources materials and components from a worldwide supplier network. We have approximately 3,100 active suppliers and contract manufacturers, of which 500 are strategic. A significant number of these are sole-source suppliers, and several of our agreements are short-term. We source many components from international markets and rely on unaffiliated domestic and international contract manufacturers to produce products or key components.

### **Due Diligence, Risk Assessment and Management**

In accordance with the international standards supporting our management systems, we regularly assess risks and opportunities related to labor, ethics and environmental, health and safety practices. We have taken multiple actions and steps to verify the absence of any form of forced labor or slavery throughout our operations and supply chain:

- [Company Policies](#)  
(Code of Ethics and Business Conduct, Labor Policy, Child Labor Policy, Supplier Code of Conduct, Supplier Quality Manual, Conflict Minerals Policy)
- Supplier Agreements and [Terms & Conditions of Purchase](#)
- [Risk Assessments](#)

- Company level: EcoVadis (achieved [Gold CSR rating](#)) and TIA Sustainability Assessor (achieved Silver rating)
- Facility level (manufacturing facilities): RBA SAQ via the RBA-Online platform. All manufacturing facilities were reviewed in 2020.
- Suppliers: CommScope Supplier Sustainability Survey or RBA SAQ (via RBA-Online).
- Data review on likely risks associated with countries
  - [US State Department Annual TIP Report](#)
  - [ITUC Human Rights Index](#)
  - [Global Slavery Index](#)
- [Internal Audits](#)  
These processes include internal audits of CommScope own facilities.
- Employee Engagement, Training and Development
- [Grievance Mechanism](#)
- [Responsible Sourcing](#) program
- [Supplier Selection and Evaluation](#) program  
These processes include on-site audits of new and existing suppliers.
- Communication:
  - [Annual Reports](#)
  - [Sustainability Reports](#)
  - Regular executive reviews with key supplier leadership teams

### **Modern Slavery Risks**

Due to the nature of our business, we engage with direct material and/or components suppliers as well as contract manufacturers within the Information and Communications Technology (ICT) industry worldwide. Some geographies lack laws to protect population vulnerable to forced labor or human trafficking risks. Our suppliers can recruit foreign or domestic migrant workers utilizing labor recruitment agencies. As a result, these workers could potentially be subject to conditions that may contribute to forced labor as outlined in the table below.

At CommScope, we utilize labor recruitment agencies to hire temporary workers for our manufacturing facilities in many countries. These workers are provided with an induction training, including labor and ethics practices, and advised to contact our hotline or use other reporting options if any issues arise.

Type of risk	Country
Debt bondage	Supply Chain in Asia-Pacific region
Excessive recruitment fees	Supply Chain in Asia-Pacific region
Passport or legal documents withholding	Supply Chain in Asia-Pacific region
Contracts not in local language	Supply Chain in Asia-Pacific region
Excessive working hours over the legal limits	Supply Chain in China and India
Gaps in wages and benefits arrangements	Supply Chain in China and India
Child labor	Supply Chain in Asia-Pacific region or Carribean & Latin America region

**Actions to Address Risks**

CommScope’s leaders have adopted a sustainability philosophy on corporate responsibility that embraces our core company values and holds us accountable to produce smart solutions that respect our people and our planet:

Meaningful integrity is a decisive personal and company-wide commitment to enable faster, smarter and more sustainable solutions while demonstrating the utmost respect for our human and natural resources.

**Modern Slavery and Human Trafficking Compliance Program**

CommScope’s compliance program for Modern Slavery and Human Trafficking is managed by the Corporate Responsibility & Sustainability (CR&S) organization, and overseen by the Corporate Ethics and Compliance Officer (CECO) and the Ethics, Compliance and Sustainability (ECS) Executive Council.

The Ethics, Compliance and Sustainability ECS program is intended to provide a corporate-level center of excellence and is designed to promote and uphold the company’s core values while fostering and promoting the culture of ethical, responsible and sustainable behaviors. In addition, the ECS program serves to mitigate the risk of non-

compliance with applicable laws, regulations and related external obligations, ensuring all vendors and business partners conform to the standards of the ECS program.

**Policies and Principles**

CommScope implemented internal policies and practices that are aligned with recognized standards and guidelines from the International Labor Organization, the United Nations (UN) Global Compact, the UN Universal Declaration of Human Rights, SA8000, ISO26000, ISO14001, ISO45001, ISO9001 and applicable laws.

CommScope key policies are available in various languages in an online [document library](#) on the company website. Employees can access all policies via intranet.

CommScope is committed to conducting its business in an ethical, legal and socially responsible manner. We expect our suppliers to share this commitment; therefore, we have established CommScope [Supplier Code of Conduct](#).

In 2020, CommScope’s CR&S team further reviewed the existing policies as a follow up to our transformation activities post ARRIS acquisition, Supplier Code of Conduct, Labor Policy and Child Labor Policy, against the applicable obligations—legal obligations, industry best practices and customer requirements. This gap analysis identified additional opportunities for improvement and specific changes to be introduced in these documents in 2021.

CommScope professionals are held to an exemplary ethical standard set by our [Code of Ethics and Business Conduct](#).

These guiding principles reflect our core values and provide a framework for expected conduct on the part of our employees and third-party representatives. While the rules and procedures outlined in the code are based on a variety of applicable laws, regulations and international standards, they also reflect a higher principle: doing the right thing.

CommScope is committed to uphold the human rights of its employees. To help ensure that our employees are treated with dignity and respect, we follow a [Labor Policy](#).

Our Child Labor Policy seeks to protect children below minimum working age and details working conditions and arrangements for young workers.

CommScope partners only with reputable organizations to source the minerals and raw materials we use. Since we provide telecommunications equipment, our products may include tin, tungsten, tantalum and gold. These materials are necessary for product functionality or production processes. As detailed in our [Conflict Minerals](#)

[Policy](#), we're committed to eliminating all irresponsibly sourced 3TGs (tin, tantalum, tungsten and gold) conflict minerals from our products and collaborate with our suppliers towards that goal.

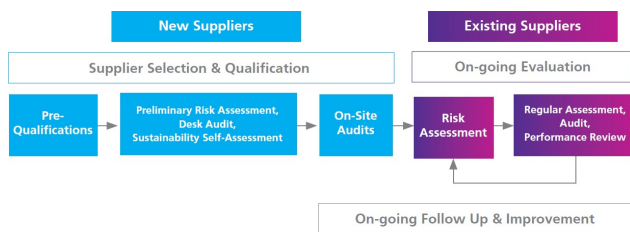
**CommScope's Operations**

All CommScope manufacturing facilities complete Corporate Social Responsibility (CSR) self-assessment (SAQ) utilizing the RBA Online platform annually. Results are reviewed and reported to the ECS Executive Council. Additionally, all manufacturing facilities are in scope of internal audits for labor, ethics, environmental and health & safety practices. The internal audits focused on labor, ethics, environmental and health & safety practices and compliance with applicable legal requirements are conducted at CommScope manufacturing facilities at least every 3 years.

**CommScope's Supply Chain**

CommScope is committed to conducting business in an ethical, legal and socially responsible manner. We expect our suppliers to share this commitment and uphold our values, which are reflected in our [Supplier Code of Conduct](#).

During our supplier selection process, we apply thorough checks and balances that help minimize risk and maximize performance and responsibility in our supply chain. Our current and prospective suppliers undergo the selection, qualification and evaluation steps outlined below.



CommScope's review and vetting process for new suppliers goes beyond cost considerations, assessing each supplier's quality capabilities, compliance with industry corporate social responsibility standards, business continuity standards and capability to be a secure supplier. Our Sourcing Evaluation Team (SET) leads the supplier engagement and helps ensure continued quality and supply resilience through ongoing programs such as audits, inspections and reliability monitoring.

To build positive long-term relationships, local supplier quality engineers oversee operations. They perform initial and regular risk assessments, in addition to on-site audits

with the suppliers in their regions. Our local supplier quality engineers also conduct regular performance evaluations, including sustainability assessments and audits, and follow-up on improvement activities.

CommScope is finalizing its streamlined supply chain responsibility strategy. Meanwhile, our legacy ARRIS business continued its full membership of the Responsible Business Alliance (RBA) and has continued to meet the full membership criteria. As part of this commitment, all major component and manufacturing suppliers from our legacy ARRIS business completed the RBA Self-Assessment Questionnaire (SAQ). This was complementary to the legacy CommScope audit program and included RBA Validated Assessment Program (VAP) audits.

CommScope is a participating member of the Responsible Minerals Initiative (RMI) — contributing to independent third-party audits and due diligence programs of conflict minerals smelters and refiners. We use the Conflict Minerals Reporting Template (CMRT) from the RMI as a standard questionnaire for conducting a reasonable country-of-origin inquiry (RCOI) to determine the source of the 3TGs.

**Demonstrating Progress/Effectiveness**

CommScope conducted 263 supplier audits/on-site assessments in 2020 and no incidents of forced labor, child labor, slavery or human trafficking were found.

Last year, the top three non-conformances were related to: Working Hours, Emergency Preparedness and Wages and Benefits

Deficiencies identified during the supplier assessments and onsite audits included limited written policies and procedures, training, risk assessment processes and implemented control measures, communication and reporting on labor, ethics, environmental, health and safety practices.

From the above we can conclude that our actions have led to a reasonably low incidence of issues .

**Consultation/Stakeholders Engagement**

CommScope communicates and collaborates internally to drive cross-functional awareness of modern slavery and human trafficking issues across global operations that could detect risks. We drive discussion related to our policies and processes amongst global supply chain organization and business segments to support our efforts to address these issues. The leaders of relevant legal

entities are consulted to develop, adopt and approve this statement.

## Training

### **CommScope's Operations**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business operations, we provide training to all relevant CommScope employees. This training is included in the annual Ethics & Compliance training package. The training emphasizes modern slavery and human trafficking risks, legislation, Company policies and processes, and employees' responsibilities.

### **CommScope's Supply Chain**

Suppliers' employees receive training annually. This training emphasized our requirement that suppliers, and those working on our behalf, must comply with our Supplier Code of Conduct and other relevant policies e.g. Code of Ethics and Business Conduct, Labor Policy, EHS Policy, Conflict Minerals Policy.

Training covers:

- Sustainability reviews, assessment and training from supplier quality engineers at supplier facilities to raise awareness of our sustainability requirements.
- Regular executive reviews with key supplier leadership teams, which includes reviewing supplier sustainability performance and improvement opportunities, as well as monitoring each supplier's sustainability performance using a dedicated scorecard.
- Ongoing training and communication with suppliers, especially our major suppliers in high-risk countries and regions.
- Conducting on-site sustainability training and communication via Webex meetings and on-premises training. We also encourage our suppliers to attend RBA training sessions.

## Other Relevant Information

CommScope remains committed to the highest standards of honest and transparent business practices, and continues to review its policies and processes annually in an effort to ensure that slavery and human trafficking is not taking place in its supply chain.

Further details about CommScope's Supplier Responsibility and Modern Slavery programs are available in the CommScope [2021 Sustainability Report](#).

## Sign Off

The statement was approved by the Board of Directors on June 25, 2021.



CommScope Holding Company, Inc.

**Claudius (Bud) E. Watts IV**

Chairman