

Corporate Legal Department

Policy Title: CommScope, Inc. Anti-Corruption and FCPA Compliance Policy
Policy Number: LEGL.POL.101
Policy Section: Compliance
Policy Owner: Burk Wyatt
Effective Date: 03/23/09
Version Number: Ver. 1.0
Last Revised: 03/02/09
Location: home.commscope.com

1.0 Purpose

- 1.1 The purpose of this Anti-Corruption and Foreign Corrupt Practices Act Compliance Policy (the "Policy") is to explain the specific requirements and prohibitions of certain U.S. and other countries' laws applicable to CommScope's business outside the U.S. and to reinforce and police our firm commitment to conduct business with honesty and integrity, no matter where in the world CommScope operates. CommScope is subject to the terms and requirements listed in the U.S. Foreign Corrupt Practices Act ("FCPA"), a provision of the Securities and Exchange Act of 1934, and other similar laws in countries where CommScope conducts business. The FCPA and such laws generally prohibit payments by companies and their representatives to foreign (i.e., non-U.S.) government and quasi-government officials to secure business.
- 1.2 The FCPA makes it illegal for U.S. citizens and companies, their officers, directors, employees and agents, and any stockholders or third parties acting on their behalf, to bribe foreign officials. The FCPA also requires accurate and complete books and records and the maintenance of proper internal accounting controls. In addition, more than 60 countries also prohibit improper payments to government officials in other countries, meaning that many of the countries where CommScope does business or may have business partners now include their own versions of the FCPA. The U.S. Department of Justice regularly teams with foreign enforcement officials to pursue corruption cases, and international conventions require countries to cooperate on extradition, mutual assistance in obtaining evidence, asset freezes and the like.
- 1.3 The FCPA imposes criminal and civil liability on both individuals and corporations. In addition to civil and criminal penalties, a person or company found in violation of the FCPA may be disqualified from U.S. government contracts, export licenses, and other government financing and insurance programs.
- 1.4 This Policy should be read in conjunction with the *CommScope Code of Ethics and Business Conduct* (the "Code of Conduct"), the *CommScope Policy for Retention of Business Associates Located or Operating Outside the United States* and other general management policies. In case of conflict between this Policy and other CommScope policies, or in cases where the provisions of this Policy are more specific than the Code of Conduct or other policies, this Policy shall take precedence.

2.0 2.0 Scope

- 2.1 This Policy extends to all of CommScope's domestic and foreign operations, including operations conducted by any departments, subsidiaries, agents, consultants or other business associates or via any majority-owned affiliates, including joint ventures.
- 2.2 Every CommScope employee, agent, consultant or other third party business associate whose duties are likely to lead to involvement in or exposure to business with foreign officials or government owned companies outside the U.S. is

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expected to become familiar with this Policy to avoid inadvertent violations and to recognize potential issues in time for them to be appropriately addressed.

- 2.3 Each such CommScope employee will also complete, sign and return an Annual Certification to the Legal Department.
- 3.0 **Restriction(s)**
- 4.0 **Applicability/Exception(s)**
- 4.1 **Applicability**
- 4.1.1 This policy applies to all CommScope employees, agents, consultants or other third party business associates.
- 4.2 **Exception(s)**
- 5.0 **Policy**
- 5.1 **FCPA Compliance**
- 5.1.1 The FCPA prohibits the bribery of “foreign officials”, and also requires U.S. companies to maintain internal accounting controls and keep books and records that accurately reflect all transactions. This Policy contains an overview of the FCPA. For more detailed information, please refer to the following cross-reference documents listed in **Section 12.0 Cross Reference 12.3 and 12.4 of this Policy:**
- 5.1.1.1 *Lay-Person’s Guide to the FCPA Statute (June 2001)*
- 5.1.1.2 *Frequently Asked Questions: Foreign Corrupt Practices Act (FCPA)*
- 5.2 **Prohibited and Restricted Payments**
- 5.2.1 The FCPA prohibits the offer, promise, authorization, or payment of a bribe or “anything of value” to a “foreign official” in order to “obtain or retain business” or to “secure any other improper advantage” through improper influence over official actions that affect CommScope. This prohibition is very broad, and covers: (1) cash payments; (2) non-cash “payments”, benefits, and favors; and (3) in certain circumstances, otherwise legitimate business expenditures such as gifts, entertainment, and hosted travel or training. The FCPA prohibits these payments whether they are made directly or indirectly through third parties, such as consultants, agents, and joint venture partners.
- 5.3 **“Foreign Officials”**
- 5.3.1 For purposes of this Policy, a “foreign official” means any officer or employee of a foreign government (i.e., other than the United States) or any department, agency, or instrumentality thereof, including government owned companies, or of a “public international organization,” any person acting in an official capacity for or on behalf of a foreign government official, a foreign political party or party official, or any candidate for foreign political office. Under this policy, “foreign officials” also include spouses and other immediate family members of foreign officials. Any questions relating to whether an individual is a “foreign official” should be directed to CommScope’s Legal Department.

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5.4 **Cash and Non-Cash Payments: "Anything of Value"**

5.4.1 The FCPA prohibits the provision of "anything of value" to a foreign official for improper purposes. This term is very broad, and can include any item of pecuniary value, including, for example:

5.4.1.1 Cash or gifts in kind;

5.4.1.2 Gift or sale of stock or other investment opportunities in other than an arm's length transaction for demonstrated fair market value, e.g., buying from an official at inflated prices or selling to an official at deflated prices;

5.4.1.3 Contracts or other business opportunities awarded to a company in which a foreign official has an ownership or other beneficial interest;

5.4.1.4 Charitable contributions;

5.4.1.5 Medical, educational, or living expenses; and

5.4.1.6 Travel, meals, lodging, shopping or entertainment expenses.

5.4.2 It is never a defense that cash payments or gifts to government officials are common or widely accepted in the country in question.

5.5 **"Improper Advantage"**

5.5.1 The FCPA's prohibition against improper payments to "obtain or retain business" or to "secure any other improper advantage" covers virtually any improper payment made in a business context. For example, CommScope employees and agents must not pay or give things of value to foreign officials, directly or indirectly:

5.5.1.1 to prevent a governmental action, such as the imposition of a tax or fine, or the cancellation of an existing contract or contractual obligation;

5.5.1.2 to obtain a license or other authorization from a government (such as the right to import goods and equipment);

5.5.1.3 to obtain confidential information about business opportunities, bids or the activities of competitors;

5.5.1.4 to obtain the right to open an office, to secure a zoning ruling or to influence the award of a government contract;

5.5.1.5 to influence the rate of taxes that would be levied on CommScope's business;

5.5.1.6 to obtain relief from government controls such as to affect the nature of foreign regulations or the application of regulatory provisions;

5.5.1.7 to resolve governmental disputes, e.g. the resolution of tax deficiencies or a dispute over duties payable;

5.5.1.8 to resolve commercial litigation in foreign courts; or

5.5.1.9 to secure any other improper advantage.

5.6 **Third Party Payments**

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5.6.1 The FCPA prohibits both direct and indirect payments to foreign officials so that CommScope can face FCPA liability based on improper payments made by other parties working on behalf of CommScope, such as its agents, consultants, distributors, resellers or other business associates. This is true where CommScope was actually aware of the conduct or where CommScope should have known, given the circumstances that such conduct was occurring or was likely to occur. The concept of “knowledge” under the FCPA statute includes “conscious disregard” or “deliberate ignorance”.

5.7 **Related Foreign Laws**

5.7.1 Although this Policy focuses mainly on compliance with the FCPA, CommScope must also comply with similar applicable local laws of each of the countries in which CommScope operates. These laws include bribery laws, the laws, regulations and policies that govern the activities of public officials, such as conflict of interest and ethics rules, tax laws, and others. Compliance with this Policy should ensure compliance with applicable local laws as well. Any questions or concerns about CommScope activities and compliance with local law related to interactions with foreign official should be brought to the CommScope Legal Department.

6.0 **Related Information**

6.1 **Guidelines**

6.1.1 The FCPA does not prohibit all payments to or on behalf of foreign officials. Certain payments that are directly related to: (i) the promotion or demonstration of CommScope’s products or services; or (ii) the performance of a particular CommScope contract with a foreign government or instrumentality, may be permissible. In other very limited circumstances – modest entertainment, meals, CommScope promotional items of a nominal value and other business courtesies – items of value can be given to foreign officials. CommScope personnel may not make or authorize any gift, payment or offer of anything of value to any foreign official, whether on the local, regional or national level, unless permitted under this Policy. Such payments, gifts or entertainment must be reasonable, fully documented, supported by original receipts, accurately recorded in CommScope’s books and records, and be made in accordance with this Policy.

6.1.2 **Gifts to and Entertainment of Foreign Officials**

6.1.2.1 Gifts can be provided to foreign officials only to the extent that they meet the criteria and approval requirements set forth in this Policy. For Company Policy with respect to other gifts and entertainment provided to third parties please see the Code of Conduct, Section V.A.2. Cultural courtesy gifts (e.g. gifts associated with official Chinese holidays or gifts normally

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exchanged in the context of first meetings in many countries) do not require prior written approval from the Legal Department; provided that:

- 6.1.2.1.1 the gifts are not cash or cash equivalents;
 - 6.1.2.1.2 gifts are CommScope promotional items (those with CommScope logo);
 - 6.1.2.1.3 the gift(s) value does not exceed \$20 U.S. in the aggregate at any one time;
 - 6.1.2.1.4 value of all gifts given to an individual in any year does not exceed \$100 U.S.; and
 - 6.1.2.1.5 value of a gift and the name of recipient(s) are supported by receipts and properly recorded in CommScope's books and records.
- 6.1.3 Meals for foreign officials do not need prior written approval from the Legal Department if they do not exceed what is generally considered common courtesy usually associated with ethical business practices in the country. In addition, expenses relating to gifts or meals to be given to foreign officials must be reasonable in light of customary gifts and entertainment in the country; not provided to induce a foreign official to misuse his/her official position; not likely to create even the appearance of being an improper payment or a conflict of interest; legal under the written foreign country's laws, rules or regulations (many foreign ministries or agencies or public international organizations have separate hospitality rules); fully disclosed, as appropriate, to the foreign government; and properly recorded in CommScope's books and records. The Procedure that must be followed for requesting approval for and properly documenting gifts is set forth below in ***Section 6.2.1, Gifts to and Entertainment of Foreign Officials***
- 6.1.4 **Hosting Foreign Official Travel**
- 6.1.4.1 CommScope may receive requests to host foreign officials for training, either at CommScope facilities, or at training opportunities sponsored by outside vendors such as universities, language study organizations, and others. CommScope may also be asked to host foreign officials at technical or operational committee meetings, other project meetings, or negotiating sessions.
 - 6.1.4.2 Paying the travel expenses of any foreign official, within or outside their home county, must be carefully structured to ensure consistency with the FCPA and applicable laws of the official's country. In addition to the FCPA, the laws or regulations of a foreign official's country will in most cases contain provisions that govern the payment or reimbursement of expenses incurred by the official. Even where the local laws

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permit CommScope to pay an official's expenses, there may be legal requirements applicable to the handling, accounting, and reporting of such payments. These laws and regulations must also be considered when planning CommScope-paid official travel.

6.1.4.3 Procedures governing payment of travel expenses for foreign officials are set forth below in ***Section 6.2.2, Hosting Foreign Official Travel.***

6.1.5 **Donations to Foreign Charities**

6.1.5.1 CommScope believes in contributing to the communities in which it does business and permits reasonable donations to foreign charities, but CommScope needs to be certain that donations to foreign-based charities are not disguised illegal payments to foreign officials in violation of the FCPA. CommScope must also confirm that the charity does not act as a conduit to fund illegal activities in violation of U.S. anti-money laundering laws. Procedures governing donations to foreign charities are set forth below in **Section 6.2.3, Donations to Foreign Charities.**

6.1.6 **Foreign Political Contributions**

6.1.6.1 It is CommScope's policy that under no circumstances shall CommScope funds be used to make political contributions to political parties or candidates in foreign countries, even if such contributions are permitted by such countries' written laws. CommScope's policy is not intended to discourage or prohibit national employees of a host country from voluntarily making personal political contributions, from participating in the political process on their own time and at their own expense, from expressing their personal views on legislative or political matters or from otherwise personally engaging in political activities in such country. Expatriate employees should, as a rule, refrain from participating in the political process in foreign countries.

6.1.7 **Third Party Payments**

6.1.7.1 CommScope must carefully choose its third party business associates doing business, or soliciting business for CommScope, outside the U.S. Prior to entering into an agreement with any sales agents, joint venture partners, consultants, resellers, distributors or other business associates who will act on behalf of CommScope with regard to development or retention of business outside the U.S., CommScope will perform appropriate FCPA-related due diligence and impose prudent safeguards against improper

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payments as set forth below in Section *6.2.8, Third Party Payments/Business Associate*.

6.1.8 Facilitating or “Grease” Payments

6.1.8.1 Because petty corruption remains a significant problem in many countries around the globe, the FCPA grants a narrow exception for what are known as “facilitating payments.” Facilitating payments are small payments made to low-level foreign officials, typically in countries with pervasive corruption problems, in order to expedite or secure the performance of “routine governmental actions.” CommScope’s policy generally does not permit employees to make facilitating payments even though they may be permitted under the law. When the refusal to make such payments may severely and adversely affect CommScope’s ability to do business in a foreign country or in cases where the health and safety of CommScope personnel are at risk an exception to this Policy may be appropriate. Requests for authorization to make such payments from regional senior management must be brought to the Legal Department for review and any such payments as well as the procedure to be followed in connection with such payments must be approved in advance by the Legal Department.

6.1.9 Record-Keeping, Accounting and Payment Practices

6.1.9.1 The record-keeping provisions of the FCPA require that CommScope establish and maintain a system of internal controls that ensures that all transactions and dispositions of assets occur only consistent with management’s authorizations, and that all such transactions are recorded accurately and in reasonable detail in the companies’ books, records and accounts. CommScope employees must follow applicable standards, principles, laws and CommScope practices for accounting and financial reporting.

6.2 Procedures

6.2.1 Gifts to and Entertainment of Foreign Officials

6.2.1.1 Other than gifts excepted under Section 6.1.2 above, prior to providing or offering any gift to or entertainment for a foreign official, CommScope employees must complete the CommScope FCPA Pre Approval Form (the “Request Form”) and submit the Request Form to the Legal Department and the appropriate Regional management representative for review and approval of the proposed gift or entertainment. The FCPA Pre-Approval Form is attached hereto as Exhibit A. The CommScope employee responsible for overseeing any gift

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permitted without prior approval under Section 6.1.2 or any approved gift or entertainment expense must submit supporting documentation relating to expenses to the local accounting organization so that the payment or expense is accurately described and reflected in CommScope's books and records. For gifts permitted without prior approval under Section 6.1.2, the CommScope employee responsible for overseeing the gifts must provide to accounting with the supporting documentation the information requested in items # 1, 2, 4, 5, 6, 8, 9 and 14 of the Request Form.

6.2.2 Hosting Foreign Official Travel

6.2.2.1 Prior to extending offers to host foreign officials at CommScope's expense, the sponsoring executive (usually senior regional manager) must submit to the Legal Department for review (1) a completed Request Form; (2) a detailed description of the proposed business meetings, activities and entertainments and (3) a schedule of expenses to be paid or reimbursed. Written approval from the foreign official's superior/supervisor must also be presented to the Legal Department as early as possible after an approved offer has been extended and prior to the event. Evidence of such written approval is required before final approval for payment of expenses will be granted. In all cases, CommScope must communicate clearly in advance, in writing to the foreign official what expenses will and will not be covered by CommScope. Actual payments must comply with the requirements set forth in the CommScope Guidelines for Paying Foreign Official's Travel Expenses set forth in Exhibit B and any other more restrictive CommScope travel and entertainment policies/restrictions that may apply.

6.2.3 Donations to Foreign Charities

6.2.3.1 Before making a donation to a charitable entity the following procedure must be followed:

6.2.3.2 Request for Approval

6.2.3.2.1 A written request describing the charity, including the name of persons contacted and attaching any supporting documentation, must be submitted by the sponsoring regional senior management executive and to the Legal Department. The request must describe how the donation will generate publicity or goodwill for CommScope and demonstrate CommScope's commitment to the community, whether local, regional or national.

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- The request must include the following backup documentation from the charity, where available:
- 6.2.3.2.2 The charity's articles of incorporation,
 - 6.2.3.2.3 statements from independent accountants,
 - 6.2.3.2.4 information reflecting the charity's purpose and key management personnel, and
 - 6.2.3.2.5 receipts, reports and other documents that demonstrate how the charity will use CommScope's funds;
- 6.2.3.3 **Background check on charitable organization**
- 6.2.3.3.1 Before authorizing any payment to a foreign charity, the Legal Department must confirm that the relevant charity is in fact a *bona fide* organization and not an entity controlled by or for the benefit of a foreign official or a conduit to fund terrorism. The verification of a charity's authenticity may include: (a) obtaining related information from the local office of the U.S. Embassy or other due diligence source and/or (b) obtaining a written opinion from local counsel regarding the legitimacy of the charity.
- 6.2.3.4 **Approval**
- 6.2.3.4.1 Prior to CommScope's donation to any foreign charity, the Legal Department must authorize, in writing, the donation and affirm that it does not violate local laws, rules or regulations.
- 6.2.3.5 **Record Retention**
- 6.2.3.5.1 Copies of documentation that substantiates CommScope's donation, such as receipts and other supporting documentation relating to the donation, must be retained by the group responsible for the entity making the donation and forwarded to the responsible local accounting group, and the payment or expense must be accurately described and reflected in CommScope's books and records.
- 6.2.4 **Third Party Payments/Business Associates**
- 6.2.4.1 The procedure for prior due diligence related to sales agents, joint venture partners, consultants, resellers, distributors or other third party business associates who will act on behalf of CommScope with regard to development or retention of business outside the U.S. can be found in *CommScope's Policy for Retention of Business Associates Located or Operating*

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Outside the United States. In addition, contracts with such business associates who are expected to specifically interact with foreign officials on international business development or retention must be approved by an Executive Vice President of the applicable business unit and the Legal Department. Once any third-party relationship has been entered into, CommScope will be vigilant in monitoring the relationship. All Agreements with sales agents, joint venture partners, consultants, resellers, distributors or other third party business associates that are located or operating outside the U.S., or otherwise have contact with third parties located outside the U.S., on behalf of CommScope include, or will be amended to include, CommScope rights to audit such business associates as described in this Policy. CommScope will obtain annual certificates of compliance from such third party business associates as described in this Policy.

6.2.5 Record-Keeping, Accounting and Payment Practices

6.2.5.1 Prior to paying or authorizing a payment to a foreign official, CommScope employees or agents must make every effort to ensure that such payment is being made in compliance with this Policy and for a legitimate purpose permitted under this Policy that will be fully and accurately described in CommScope's books and records. All payments to a foreign official must be accurately reported, and no false or artificial entries may be made in the books and records of CommScope for any reason. No undisclosed or unrecorded accounts of CommScope may be established for any purpose. Personal funds must not be used to accomplish what is otherwise prohibited by CommScope policy.

6.2.6 Financial Control Systems and Accounting Requirements

6.2.6.1 The Accounting Department shall support a process for the design and operating effectiveness of internal control over financial reporting. This process shall include policies and procedures providing reasonable assurance that:

6.2.6.1.1 Records are maintained in adequate detail and accurately and fairly reflect transactions;

6.2.6.1.2 Expenditures are being made only in accordance with authorizations of management and directors pursuant to applicable CommScope policies, including this Policy; and

6.2.6.1.3 Unauthorized acquisition, use or disposition of assets will be prevented or timely detected.

6.2.7 Audit Procedures To Verify Compliance

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- 6.2.7.1 The Internal Audit Department will conduct regular audits of CommScope's books, records and accounts pursuant to its charter and the direction of the CommScope Audit Committee. Such audits will include testing and review procedures, where appropriate, that are designed to provide reasonable assurance that CommScope is in compliance with the FCPA and this Policy. Such audits should include review of the following items:
 - 6.2.7.1.1 CommScope's strategy to ensure compliance with the FCPA;
 - 6.2.7.1.2 communication with and education of all pertinent employees and third-party representatives;
 - 6.2.7.1.3 the establishment and implementation of monitoring mechanisms related to this Policy;
 - 6.2.7.1.4 review of CommScope's books and records pertaining to the entertainment, gift, and travel expenditures of CommScope;
 - 6.2.7.1.5 due diligence procedures taken prior to entering into arrangements with third party business associates; and
 - 6.2.7.1.6 efforts taken by CommScope to ensure third party business associates comply with the FCPA.

6.2.8 Annual Questionnaire/Certification

- 6.2.8.1 On an annual basis, sales and finance personnel and third party business associates located outside the U.S. as well as other employees who do or may have contact with foreign officials (e.g. personnel involved in customs clearance or tax matters) or contact with third party business associates that are located or operating outside the U.S., or otherwise have contact with third parties located outside the U.S., on behalf of CommScope, will complete the *Annual Anti-Corruption and FCPA Employee Compliance Questionnaire* attached hereto as Exhibit C. The Legal Department will determine who shall receive the survey/questionnaire and, at the direction of the General Counsel, will review and follow-up on, including formal investigation as necessary, any adverse questionnaire responses.

7.0 Administration

7.1 All Employees

- 7.1.1 Every employee is responsible for ensuring that no gifts, payments or offers of gifts, payments or anything of value are made or authorized to "foreign officials" without following the procedures set forth in this Policy.

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7.2.1 The Legal Department and CommScope’s General Counsel are responsible for reviewing requests for authorization of gifts and promotional or marketing expenses and for approving such requests when such payment, gift or offer would not violate either the FCPA or this Policy. The Legal Department is responsible for (i) training appropriate employees, agents, consultants and third party business associates on this Policy, (ii) obtaining certifications of compliance from such personnel and, with the assistance of sales, annual certifications from third party business associates, (iii) managing the *Annual Anti-Corruption and FCPA Employee Compliance Questionnaire* process and (iv) maintaining proper FCPA compliance and oversight files.

7.3 **Internal Audit Department**

7.3.1 Pursuant to its charter and as directed by the CommScope Audit Committee, the Internal Audit Department is responsible for maintaining an internal audit program for CommScope to, among other things, monitor and audit systems designed to detect violations of CommScope policy and of applicable laws, including, where appropriate, this Policy and the FCPA and other anti-bribery laws and conventions.

7.4 **Accounting/Finance Department**

7.4.1 The Accounting and Finance Department is responsible for maintaining and enforcing CommScope’s accounting and recordkeeping policies, and maintaining CommScope’s system of internal control to ensure that assets of CommScope are disbursed only as authorized by management, as set forth in this Policy, and that CommScope books and records are accurate at all times.

8.0 **Term(s)/Definition(s)**

8.1 See **Section 12.0 Cross Reference** (below) for sources containing more detailed descriptions of the FCPA. The FCPA and other Anti-Bribery laws are very complex. Because of this complexity, it is essential to consult the CommScope Legal Department in all circumstances where the FCPA and other Anti-Bribery laws could apply.

9.0 **Acronym(s)**

10.0 **Form(s)**

- 10.1 FCPA Pre-Approval Form, Exhibit A 
- 10.2 CommScope Guidelines for Paying Foreign Official Travel Expenses, Exhibit B and C 
- 10.3 CommScope Annual Anti-Corruption and FCPA Compliance Questionnaire, Exhibit B and C 

11.0 **Related Addenda**

- 11.1 **Region/Designated Geographic Area**
- 11.2 **Country Specific**
- 11.3 **State Specific**
- 11.4 **Site Specific**

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12.0 Cross Reference

- 12.1 CommScope Code of Ethics and Business Conduct
- 12.2 CommScope Policy for Retention of Business Associates Located or Operating Outside the United States
- 12.3 Lay-Person's Guide to the FCPA Statute (June 2001) see <http://www.usdoj.gov/criminal/fraud/docs/dojdocb.html>
- 12.4 Frequently Asked Questions: Foreign Corrupt Practices Act (FCPA) [http://home.commscope.com/esc/HRPolicies/Human%20Resources%20Policies%20and%20Procedures%20Index/FCPA%20FAQ%20\(SFODMS-6558198-v1\).pdf](http://home.commscope.com/esc/HRPolicies/Human%20Resources%20Policies%20and%20Procedures%20Index/FCPA%20FAQ%20(SFODMS-6558198-v1).pdf)

13.0 Disclaimer

- 13.1 CommScope reserves the right to modify, amend or deviate from this Policy, Procedure, Process or Guideline from time-to-time in its sole discretion, with or without notice, subject to applicable law.

14.0 Document History

<u>Version Number</u> (Ver. 1.0, etc.)	<u>Effective Date</u>	<u>Name Business Group / Function Owner</u>	<u>Changes / Approvals</u>	<u>Supersedes</u>
Ver. 1.0	3/23/09	Corporate Legal; Burk Wyatt	Policy Consolidation Project.	This policy replaces and supersedes any/all previous CommScope and/or Andrew policies.
Ver. 1.0	7/13/09	Corporate Legal; Burk Wyatt	6.2.3.5 Record Retention, 6.2.3.5.1 Deleted the words Accounting Department and changed it to say "responsible local accounting group".	3/23/09