



About CommScope

This statement is intended to meet CommScope's reporting obligations under the U.K. Modern Slavery Act (2015). 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, 2019 and December 31, 2019 (fiscal year).

CommScope, Inc. of North Carolina is a wholly-owned subsidiary of CommScope Holding Company, Inc. which is the ultimate parent company. 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 more than 150 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.

In April 2019, CommScope completed the acquisition of ARRIS, a global leader in entertainment and communications' solutions, for approximately \$7.4 billion, including the repayment of debt.

The acquisition brought together two companies—established and respected leaders in their respective markets—with a unique set of complementary assets and capabilities that enable end-to-end communications infrastructure and connectivity solutions. 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.

Our commitment enables us to invest wisely in our future. By utilizing innovative technology, intelligent engineering and energy-efficient designs, we're building sustainable networks that make our customers more agile while also preserving the natural ecosystems from which we source our raw materials.

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 Executive Council.

As a result of our 2019 transformation activities, CommScope's executive leadership introduced the Ethics, Compliance and Sustainability (ECS) program and adopted further changes to the governance of the ECS program. The 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.

Ethics, Compliance and Sustainability Vision Statement

Acting with integrity is one of CommScope's core values. We fundamentally believe that a culture of ethics, compliance and sustainability is critical to our company's success. We also believe this culture must be embedded in our business practices and constantly nurtured.

While integrity includes compliance with applicable law and our other obligations, mere compliance is not enough for CommScope. We therefore strive for excellence in our Ethics, Compliance and Sustainability Program, seeking to foster a working environment where honesty, transparency, fairness and respect are valued and practiced consistently.

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 new operating structure, our new segments are Venue and Campus Networks, Broadband Networks, Outdoor Wireless Networks and Home Networks.



Our solutions deliver wired and wireless connectivity: Wi-Fi, DAS, CBRS, small cells, switching, and cabling for licensed and unlicensed indoor coverage; IP networks and cabling, connectors, and equipment for data centers in enterprise buildings, campuses and public venues.



Our solutions encompass network cable and connectivity, CMTS, PON, access technologies, network intelligence and automation, and technical and professional services.



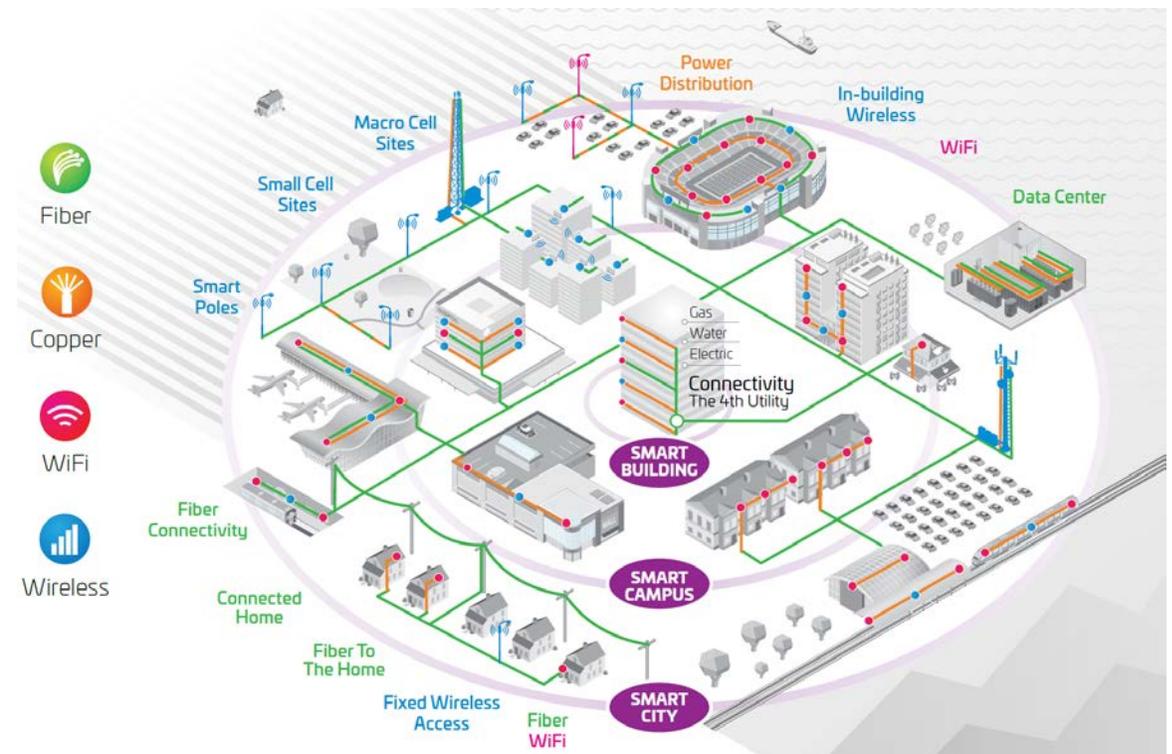
Our solutions are the backbone of outdoor cellular and Wi-Fi systems, including cell tower antennas, cabinets, cabling, data and power connectivity.



Our solutions power the connected home experience. Our broadband and video devices and services enable service providers to deliver the best broadband, Wi-Fi, video and smart home services to millions of subscribers around the globe.

2019 COMMSCOPE FACTS

~ 30,000 employees	~ 4,000 suppliers	~ 4,300 customers
~ 15,000 patents	> \$ 800M invested in R&D each year	> 10,000 partners supporting customers in over 150 countries
\$8,345M 2019 net sales		



CommScope Supply Chain

CommScope sources its materials and components from a worldwide network of suppliers. We have approximately 4,000 active suppliers and contract manufacturers around the globe, 550 of these being strategic.

Our supply chain covers many countries and regions.

A significant number of our strategic suppliers are sole source suppliers and several of our agreements with suppliers are short-term in nature. Many of our components are sourced from international markets, relying on unaffiliated contract manufacturers, both domestically and internationally, to produce certain products or key components of products.

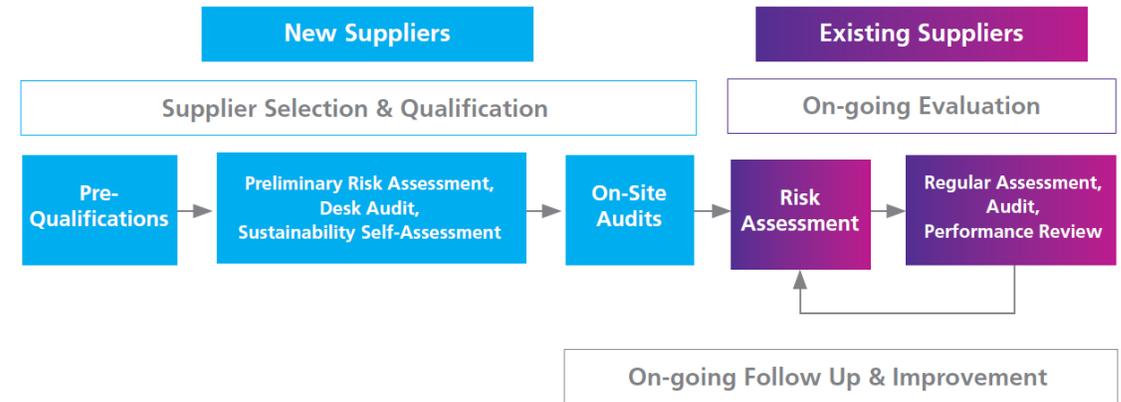
The principal raw materials and components we purchase are made of metals such as copper, steel, aluminum or brass, plastics and other polymers and optical fiber. This also includes purchase of circuit boards and other electronic components. Fabricated copper, steel and aluminum are used in the production of antennas, coaxial and twisted pair cables, and polymers are used to insulate and protect cables. Such materials continually experience significant volatility as a result of changes in the levels of global demand, supply disruptions and other factors. As a result, CommScope proudly optimizes our global manufacturing and distribution footprint to better position us to respond quickly to rapidly changing market conditions, whilst 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.

Suppliers by geographic location and by monetary value spent by region

Region	Geography	Monetary Value
Asia-Pacific	31%	45%
Europe, Middle East, Africa	24%	6%
Americas	45%	49%
TOTAL	4,000*	\$5 billion*

*Rounded figures.

In selecting suppliers, CommScope applies a thorough system of checks and balances designed to minimize risk and maximize performance in our supply chain. Current and prospective suppliers undergo the selection, qualification and evaluation steps outlined below:



Following the acquisition of ARRIS in 2019, CommScope maintained a separate management process for supplier responsibility in the legacy ARRIS supply chain. Through this we have continued the legacy ARRIS Responsible Business Alliance (RBA) full membership, now in its fourth year, and continued to meet the revised full membership criteria.

As part of this commitment, all major component and manufacturing suppliers from legacy ARRIS completed the RBA Self-Assessment Questionnaire (SAQ). This was complementary to the legacy CommScope audit program and included RBA Validated Assessment Program (VAP) audits.

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 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 2019, CommScope's CR&S team reviewed the existing policies as part of 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 opportunities for improvement and specific changes to be introduced in these documents in 2020.

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.

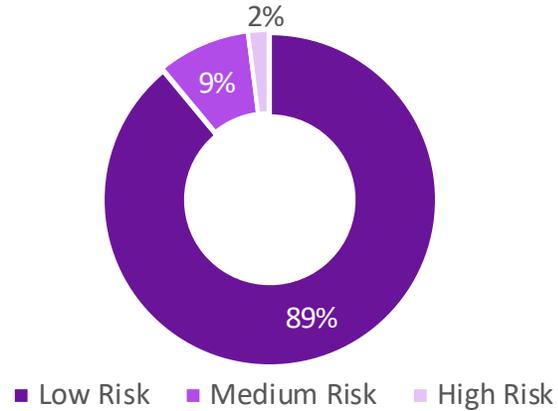
CommScope is committed to uphold the human rights of its employees. To ensure that our employees are treated with dignity and respect, we follow a [Labor Policy](#).

Due Diligence, Risk Assessment and Management

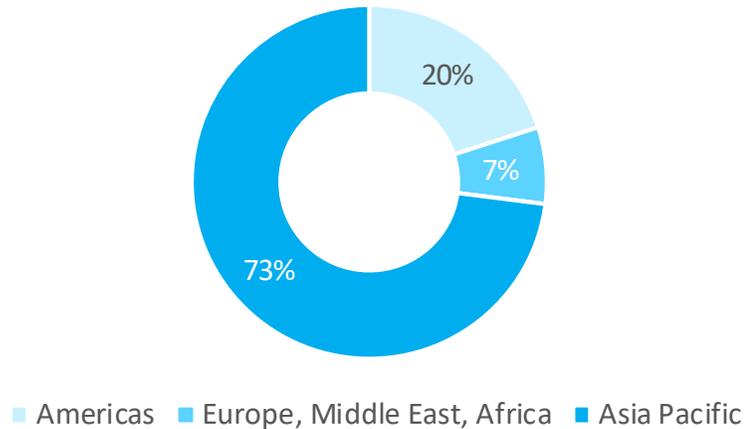
In accordance with the international standards supporting our management systems, we regularly assess risks and opportunities related to labor, ethics and environmental, health and safety practices. We have taken multiple actions and steps to verify the absence of any form of forced labor or slavery 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 2019.
 - 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

Supplier Sustainability On-site Assessments by identified risk levels conducted in 2019



Supplier Sustainability On-site Assessments by region conducted in 2019



CommScope works with its suppliers, existing and new, to address gaps identified during the audits and expects any gaps to be closed within a specified timeframe. In addition to all other legal and contractual rights, CommScope reserves the right to disqualify any potential supplier or terminate its relationship with any current supplier found to be in violation of our Supplier Code of Conduct. CommScope conducted 240 supplier audits/on-site assessments in 2019 and no incidents of forced labor, slavery or human trafficking were found.

Last year, the top three non-conformances were related to:

- Working Hours
- Emergency Preparedness
- Wages and Benefits

Suppliers with the overall sustainability rating indicating high risk are located in China and India. 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.

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 [2019 Sustainability Report](#).

The statement was approved by the Board of Directors for CommScope Inc. of North Carolina.

June 26, 2020

Eddie Edwards
President and Chief Executive Officer