

2021 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 and supply chain. Unless otherwise noted, all information and data in this statement pertains to activities that transpired between January 1, 2021 and December 31, 2021 (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. We have a team of over 35,000 people who serve our customers in over 150 countries through a network of world-class manufacturing and distribution facilities strategically located around the globe.

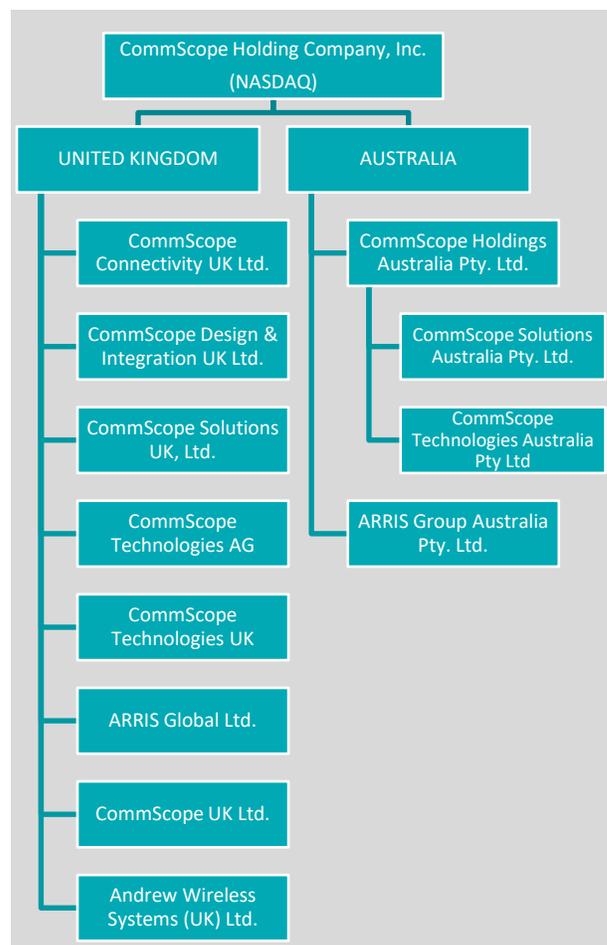
Our customers include substantially all the leading global telecommunications operators, data center managers, cable television providers or multi-system operators (MSOs) and thousands of enterprise customers, including many Fortune 500 companies.

CommScope helps design, build and manage wired and wireless networks around the world. programmers to deliver media, voice, Internet Protocol (IP) data services and Wi-Fi to their subscribers and allow enterprises to experience constant wireless and wired connectivity across complex and varied networking environments. Our solutions are supported by our broad array of services including technical support, systems design and integration. We are a leader in digital video and IP television (IPTV) distribution systems, broadband access infrastructure platforms and associated data and voice

customer premises equipment. Our global leadership positions are built upon innovative technology, broad solution offerings, high-quality and cost-effective customer solutions, and global manufacturing and distribution scale.

We participate in the large and growing global market for connectivity and essential communications infrastructure. This market is being driven by the growth in bandwidth demand associated with the continued demand of smartphones, tablets and machine-to-machine (M2M) communication as well as the proliferation of data centers, Big Data, cloud-based services, streaming media content and Internet of Things (IoT). In addition, video distribution over the broadband IP network is transforming how content is managed and consumed. IP facilitates new forms of video such as Over-the-Top (OTT) and interactive television.

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



## CommScope Operations

Following detailed reviews of the markets we serve and our portfolio of products and solutions, we announced a strategic update to our core business segments in December 2021. Our new structure consists of five business segments, each with multiple respective business units. Updated business segments: Cable Connectivity Solutions (CCS), Outdoor Wireless Networks (OWN), Networking Indoor Cellular and Security Solutions (NICS), Home Networks (HN) and Access Networks Solutions (ANS). We have moved to a general management model in our segments.

We maintain a balance of internal and external manufacturing providers. We develop, design, fabricate, manufacture and assemble many of our products and solutions in-house at our facilities. Our manufacturing and distribution facilities are strategically located to optimize service levels and product delivery times. We utilize lower-cost geographies for high labor content products while investing in largely automated plants in higher-cost regions close to customers.

We have over 100 established manufacturing, administration and research and 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 Supply Chain

CommScope's supply chain is as important to us as our own operations. 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. We strive to work with partners who have the highest standards. This commitment is key to CommScope's ability to expand in new markets. Support from supplier partners is key to promoting mutually beneficial, long-term relationships and sustainable practices in our supply chain.

Our products are manufactured or assembled from both standard components and parts that are unique to our specifications. Our internal manufacturing operations are largely process oriented and we use significant quantities of various raw materials, including aluminum, copper, steel, bimetals, optical fiber and plastics and other polymers, among others. 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 2,600 active direct suppliers and contract manufacturers, of which 500 are strategic. Our supply chain covers many countries and regions. 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.

We utilize contract manufacturers located throughout the world, including in Brazil, China, Malaysia, Mexico, South Africa, Thailand, Vietnam and the U.S., for many of our product groups.

### Suppliers by geographic location

Asia-Pacific (APAC)	27%
Europe, Middle East, Africa (EMEA)	31%
Americas	42%
TOTAL	2,600

### Supplier monetary value spend by region

Asia-Pacific (APAC)	38%
Europe, Middle East, Africa (EMEA)	8%
Americas	54%
TOTAL	\$4.2billion

## 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 2021 and achieved low risk rating.
  - 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 Global 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.

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 provisions	Supply Chain in China and India
Child labor	Supply Chain in Asia-Pacific region or Caribbean & Latin America region

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.

## 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 programs for Modern Slavery and Human Trafficking and Supplier Responsibility are managed by the Corporate Responsibility & Sustainability (CR&S) organization, and overseen by the Executive Team

and the Ethics, Compliance and Sustainability (ECS) Executive Council.

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.

## Policies and Principles

CommScope implemented internal policies and practices that are aligned with recognized standards and guidelines from the International Labor Organization (ILO), 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 2021, CommScope's CR&S team continued to review the existing policies, with a view of becoming a member of the Responsible Business Alliance (RBA), 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 2022.

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. It also defines minimum age for employment with CommScope and outlines child labor remediation and immediate actions taken if it is determined that someone below the minimum age is working for CommScope.

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 Operations

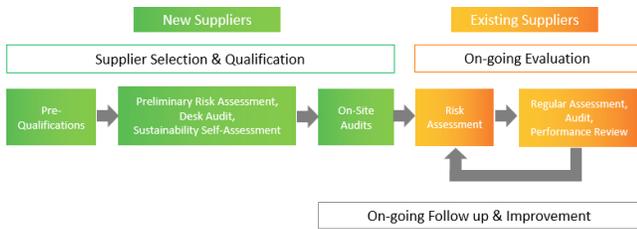
All CommScope manufacturing facilities complete Corporate Social Responsibility (CSR) self-assessment (SAQ) utilizing the RBA Online platform annually. Results are reviewed and reported to the ECS Executive Council. Additionally, all manufacturing facilities are in scope of internal audits for labor,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

CommScope manufacturing facilities are certified in line with the [ISO14001:2015](#) and [ISO45001:2018](#) standards. The certification process includes onsite assessments/audits by a third party/registrar auditors.

## CommScope Supply Chain

CommScope is committed to conducting business in an ethical, legal and socially responsible manner.

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 continues its full membership of the RBA and has met the full membership criteria through 2021. 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 conduct an annual reasonable country of origin inquiry (RCOI) into the source of any Conflict Minerals (3TGs) present in our products by collecting data from our suppliers using the industry standard Conflict Minerals Reporting Template (CMRT).

### Demonstrating Progress/Effectiveness

CommScope conducted 268 supplier audits/on-site assessments in 2021 and no incidents of forced labor, child labor, slavery or human trafficking were found.

CommScope’s Supplier Quality Engineers (SQEs) and/or third-party auditors review supplier practices,

arrangements, controls and records during each on-site and/or remote assessment/audit. We document any deficiencies and require corrective action within agreed upon timeframes.

Last year, the top three non-conformances were related to: Working Hours, Emergency Preparedness and Occupational Safety. 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 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.

In 2021, CommScope supplier quality engineers received training on supplier sustainability requirements and sustainability audit process.

#### CommScope Supply Chain

Suppliers’ employees are engaged on a regular basis. This initiative 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.

The suppliers engagement 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. CommScope measures sustainability performance using a dedicated scorecard.
- Ongoing training and communication with suppliers, particularly those 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.

In addition, we created training materials for our suppliers to support our product compliance and sustainability efforts. We sent these materials to about 4,500 vendor contacts.

### 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 operations and/or supply chain.

Further details about CommScope's Supplier Responsibility and Modern Slavery programs are available in the CommScope [2022 Sustainability Report](#).

### Sign Off

The statement was approved by the Board of Directors on June 29, 2022.



CommScope Holding Company, Inc.

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

Chairman