Product Compliance (PC) -Conflict Minerals - Policy

COMMSCOPE

		<u> </u>	
Owner:	Director, Product Safety & Compliance	Document No:	COMM-PC-1001
Approver:	VP, QA Engineering	Revision Date:	18 Nov 2020
Approver:	VP, Quality		Corporate Operations
Approver:	VP, Quality		
Approver:	VP, Chief Procurement Officer		
Approver:	VP, & Deputy General Counsel		
Approver:	VP, Corporate Accounting		
Approver:	VP, Home Networks Quality		

In line with CommScope's Code of Ethics and Business Conduct, we support the purpose of Section 1502 ("Section 1502") of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"). This Act aims to end human rights violations by preventing the use of certain "Conflict Minerals" (as defined in Section 1502) that directly or indirectly finance or benefit the illegal armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries ("covered countries" as defined in the Act). Conflict Minerals is currently defined to include columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) and their derivatives, and any other minerals and their derivatives that finance conflict in the DRC or adjoining countries, as determined by the U.S. Secretary of State.

CommScope is committed to upholding and maintaining our core values with respect to human rights, ethics and environmental responsibility regarding Conflict Minerals. To that end, CommScope is committed to:

- Being a participating member of the Responsible Minerals Initiative (RMI) and contributing to independent third-party audits and due diligence programs of conflict minerals smelters and refiners;
- Avoiding the use of Conflict Minerals which directly or indirectly finance or benefit the illegal armed groups in the covered countries;
- Complying with the reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission;
- Conducting reasonable country of origin inquiries into the source of any Conflict Minerals included in our products to determine whether any of the Conflict Minerals originated in the covered countries or are from scrap or recycled sources;
- Where required, implementing appropriate due diligence and reporting processes with respect to the source and chain of custody of its Conflict Minerals; and
- Obligating our suppliers to ensure that all products or materials provided to CommScope are in conformance with this policy.

CommScope's suppliers are required to comply with all applicable requirements regarding Conflict Minerals and responsible sourcing and to cooperate with CommScope to ensure that CommScope can meet its own legal obligations. Suppliers are also responsible for passing on the same requirements to their suppliers. Suppliers will, upon request, be required to declare that all products, components, and materials supplied either:

- Do not contain Conflict Minerals that are necessary to their production or functionality; or
- If they do contain Conflict Minerals, they originate from non-conflict areas, from smelters that have been validated by an independent private sector party to be conflict free, or do not directly or indirectly finance or benefit the illegal armed groups in the covered countries.

CommScope will evaluate the relationships with our suppliers on an ongoing basis to ensure continued compliance with this policy. CommScope reserves the right to request additional documentation from our suppliers regarding the source of Conflict Minerals included in their products. In addition, suppliers will be required to maintain and, upon request, provide to CommScope traceability data for a minimum of five years.

The Product Compliance Team shall create procedures to ensure all related functions are in compliance to this Conflict Minerals policy. The Product Compliance Team shall ensure all related functions are trained on this policy and any procedure related to this policy.