



2023 Modern Slavery Act Statement



Introduction

This statement is intended to meet CommScope's reporting obligations under the U.K. Modern Slavery Act (2015), Australian Modern Slavery Act 2018 (Cth) and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211, commonly referred to as the Modern Slavery act). This statement describes our efforts to address modern slavery and child labor, 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, 2023 and December 31, 2023 (fiscal year).

Reporting Entity

As a U.S.-based multinational company, we choose to provide a joint statement regarding modern slavery forced labor and child labor 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/Activities and Supply Chains

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".

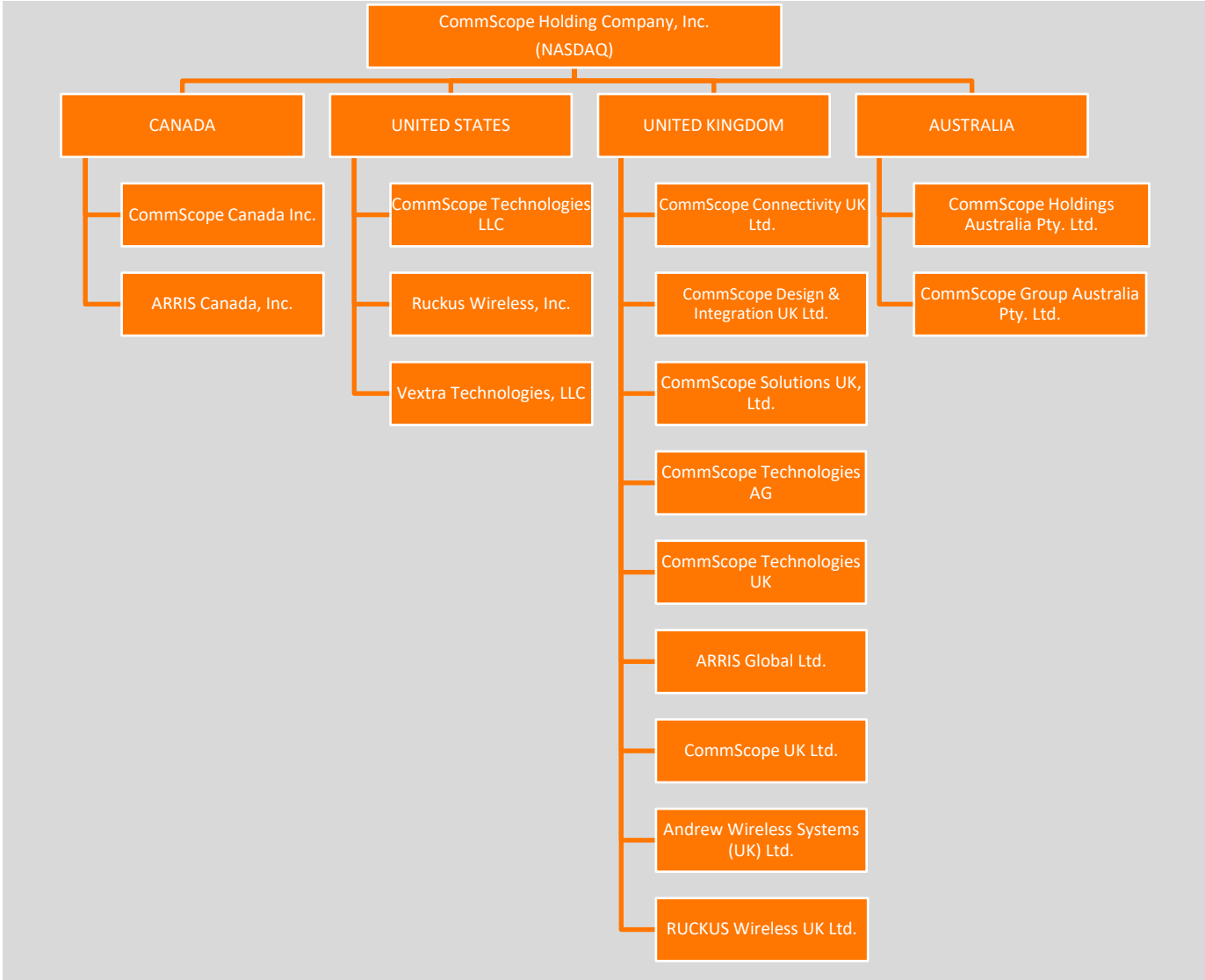
CommScope's global headquarters is located in Claremont, NC, U.S. In 2023, we had a team of over 26,000 employees who served our customers in over 150 countries through a network of world-class manufacturing and distribution facilities strategically located around the globe. The employee headcount includes permanent/regular and temporary employees including internal temporary and external temporary employees. As of December 31, 2023, CommScope employed 46 employees in Canada, 114 in Australia, 636 in the United Kingdom and 26,000 in other countries.

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. The company provides solutions for wired and wireless networks to enable service providers, including cable, telephone, data center and digital broadcast satellite operators and media 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



In 2023, the following entities imported and sold goods (produced outside Canada) into Canada: CommScope Canada, Inc.; CommScope Technologies LLC; Ruckus Wireless, Inc.; Vextra Technologies, LLC; ARRIS Global Ltd.; CommScope UK Ltd. ARRIS Canada, Inc. didn't sell products but it provided sales and support services to ARRIS Global Ltd. (who sold into Canada).

CommScope Operations

In 2023, our business structure consisted of five business segments, each with multiple respective business units, as follows: Cable Connectivity Solutions (CCS), Outdoor Wireless Networks (OWN), Networking Indoor Cellular and Security Solutions (NICS), Home Networks (HOME) and Access Networks Solutions (ANS). We apply a general management model in our segments. CommScope sold its HOME business segment to Vantiva in January 2024.

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. The key facilities are located in Argentina, Australia, Belgium, Brazil, China, Colombia, the Czech Republic, France, Germany, India, Ireland, Italy, Japan, Mexico, Singapore, United Kingdom (U.K.) and the United States (U.S.). In 2023, CommScope operated 21 manufacturing facilities located in Belgium, Brazil, China, the Czech Republic Ireland, India, Mexico, U.K. and the U.S.

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 deliver 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 2,500 active direct suppliers and contract manufacturers, of which approximately 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 also have approximately 11,000 indirect suppliers in 83 countries—with the highest spend in the U.S., Mexico and Brazil in Americas region; U.K., Netherlands and Czech Republic in the Europe, Middle East and Africa (EMEA) region; and China, India and Singapore in the Asia-Pacific (APAC) region.

In 2023, CommScope had approximately 13,500 direct and indirect suppliers and spent approximately \$4.9 billion.

Suppliers by geographic location

Asia-Pacific (APAC)	27%
Europe, Middle East, Africa (EMEA)	30%
Americas	43%

Supplier by monetary value spend

Asia-Pacific (APAC)	35%
Europe, Middle East, Africa (EMEA)	11%
Americas	54%

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

Policies, 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, slavery and child labor 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](#))
 - Facility level (manufacturing facilities): RBA Self-Assessment Questionnaire (SAQ) via the RBA-Online platform. All manufacturing facilities were reviewed in 2023 and achieved low risk rating.
 - Suppliers: CommScope Supplier Sustainability Survey or RBA SAQ (via RBA-Online)
- Data review on likely risks associated with countries
 - [U.S. State Department Annual TIP Report](#)
 - [U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor](#)
 - [ITUC Global Rights Index](#)
 - [Global Slavery Index](#)
 - [Unicef Child Labor Data](#)
- [Internal Audits](#)
 - These processes include internal audits of CommScope own facilities.
- Employee Engagement, Training and Development
- [Supply Chain Training](#)
- [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 populations 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 or child labor as outlined in the table below.

Type of risk	Country
Recruitment fees are charged	Supply Chain in Asia-Pacific region
Restriction of workers movement	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 Asia-Pacific region
Gaps in provision of wages and benefits	Supply Chain in China and India
Child labor	Supply Chain in Asia-Pacific region or Carribean & 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](#) (CommAlert), a dedicated [web portal](#) or an email account (ethics@commscope.com) or use other reporting

options if any issues arise. We enforce a strict policy that prohibits any form of retaliation against those who, in good faith, report a concern or suspected misconduct.

Actions/Measures 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 Board's Audit Committee, Executive Team and the Executive Sustainability Council.

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's [Supplier Code of Conduct](#).

In 2023, CommScope's CR&S team continued to review the existing policies to ensure alignment with the Responsible Business Alliance (RBA). We updated our Supplier Code of Conduct to better align with the applicable obligations—legal obligations, industry best practices and customer requirements. Following this update, we have seen 6,230 suppliers, representing 79% of our spend, accept the updated code. We mandate that our suppliers include our sustainability and corporate responsibility requirements in their supplier code of conduct and contractual documents and that they cascade these requirements down their supply chains to include secondary, tertiary and other tier suppliers. We are planning to continue with further gap analysis to identify additional opportunities for improvement in 2024.

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) SAQ utilizing the RBA Online platform annually. Results are reviewed and reported to the Executive Sustainability 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 according to 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 working to streamline its supply chain responsibility strategy. Meanwhile, our legacy ARRIS business continued its full membership of the RBA and has met the full membership criteria through 2023. To maintain this commitment, all major component and manufacturing suppliers from our legacy ARRIS business completed the RBA SAQ. This was complementary to the legacy CommScope audit program and included RBA Validated Assessment Program (VAP) audits. Legacy ARRIS business high-risk and strategic suppliers completed the RBA audit in 2023. Since 2022, our major indirect suppliers are also included in the RBA SAQ and audit process.

CommScope’s legacy ARRIS business 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 189 supplier audits/assessments in 2023 and no incidents of child labor, forced 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.

In 2023, the top three non-conformances were related to: working hours, occupational safety and emergency preparedness. 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.

The audit process identified two findings in the freely chosen employment category – zero priority/critical, one major and one minor. Both findings were related to the timeline of fee reimbursement for pre-employment health checks, the identified reimbursement period was 75 days. The identified deficiencies were formally documented in corrective action plans by respective suppliers. According to the RBA guidelines, the major findings are expected to be rectified within 180 days, and the minor findings are expected to be rectified within 270 days. Corrective and preventative actions were put in place to address the identified deficiencies.

No measures had to be taken to remediate any forced or child labor. No measures had to be taken to remediate the loss of income to the most vulnerable families that resulted from any measures taken to eliminate the use of forced labor or child labor in our activities and supply chains.

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

In 2023, we engaged more than 207 of identified in-scope suppliers and saw a 100% response rate in our RCOI and conflict minerals due diligence process.

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 various teams across all 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.

Additionally, the ongoing stakeholders engagement and dialogue related to the identified environmental, social and governance (ESG) material issues, risks and opportunities is outlined in our annual [Sustainability Reports](#) and on our [website](#).

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 utilize commercially developed training together with CommScope specific content for all relevant CommScope employees based on employee's role and risk profile. This training will be included in the annual Ethics and Compliance training cycle. The training emphasizes modern slavery and human trafficking risks, Company policies and processes, and employees' responsibilities.

CommScope's 10,068 non-production employees and the board completed the online Ethics and Compliance training in 2023. 100% of the targeted group completed the annual mandatory Ethics and Compliance course via THRIVE@CommScope learning platform. CommScope supplier quality engineers received training on the updated Supplier Code of Conduct and sustainability audit process. We also offer optional Modern Slavery basic training developed by an external organization hosted on THRIVE.

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 supplier engagement activities include:

- 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, coaching and communication with suppliers, particularly those in high-risk countries and regions.
- Conducting on-site sustainability training and communication via video call meetings and on-premises training. We also encourage our suppliers to attend RBA training and use other RBA online resources.

To help our suppliers improve their knowledge of the RBA Code of Conduct, we've conducted virtual training sessions for high-risk and new suppliers using the RBA e-Learning academy and RBA online training sessions. In 2023, 78% of in-scope suppliers improved their RBA Validated Assessment Program (VAP) audit scores after completing the sessions and assessments.

Our corporate Product Compliance team utilizes CommScope University for training in Customer Service, and the Engineering teams for learning about product compliance regulations and related procedures. The training includes CommScope policies and procedures for product compliance activities and a regulatory refresher for major product-related regulations.

In addition, we have training materials for our suppliers to support our product compliance and sustainability efforts and inform vendors about our [Product Compliance Specification](#) and [Restricted Substance List](#) and [Supplier Code of Conduct](#).

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 [2024 Sustainability Report](#).

Sign Off/Attestation

The statement was approved by the Board of Directors on May 22, 2024.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



I have the authority to bind CommScope Holding Company, Inc.

Claudius (Bud) E. Watts IV

Chairman