



2024 Supplier Code of Conduct Training

Corporate Responsibility & Sustainability

September, 2024

Agenda

1. Corporate Responsibility & Sustainability (CR&S) Program Overview
2. Supplier Responsibility Overview
3. Supplier Code of Conduct Overview
4. Backup Information

Corporate Responsibility & Sustainability at CommScope

CommScope is committed to the highest standards of business integrity and environmental sustainability. Sustainability means making decisions that have a positive impact on our people, planet and bottom line. Environmental, Social and corporate Governance (ESG) is an approach evaluating how well a business performs in terms of sustainability, focusing on three key pillars:

ENVIRONMENTAL

The impact that CommScope's operations have on the environment.

Guiding Standards & Principles
ISO26000, ISO14001 , UN, RBA, CDP

Key Company Policies
[EHS Policy](#)
[Environmental Product Compliance Policy*](#)
[Environmental Product Compliance Specification for Materials and Products](#)
[CommScope Restricted Substance List \(2024\)](#)

[Supplier Code of Conduct](#)

SOCIAL

The impact that CommScope has on its employees and society as a whole.

Guiding Standards & Principles
ISO26000, ISO45001, SA8000, UN, ILO, WHO, RBA

Key Company Policies
[EHS Policy](#)
[Global Labour Policy](#)
[Global Child Labour Policy*](#)
[Conflict Minerals Policy](#)

[Supplier Code of Conduct](#)

ETHICS & GOVERNANCE

The core principals and values that underpin CommScope's business.

Guiding Standards & Principles
ISO26000, ISO37001, ISO19600, UN, RBA

Key Company Policies
[Code of Ethics & Business Conduct](#)
[Anti-Corruption Policy](#)
[Anti-Boycott Laws Policy*](#)
[Conflict of Interest Policy*](#)
[Export Controls & Sanctions *](#)
[Intellectual Property Protection*](#)

[Supplier Code of Conduct](#)

Supplier Responsibility Requirements

Supply Chain Contractual Requirements

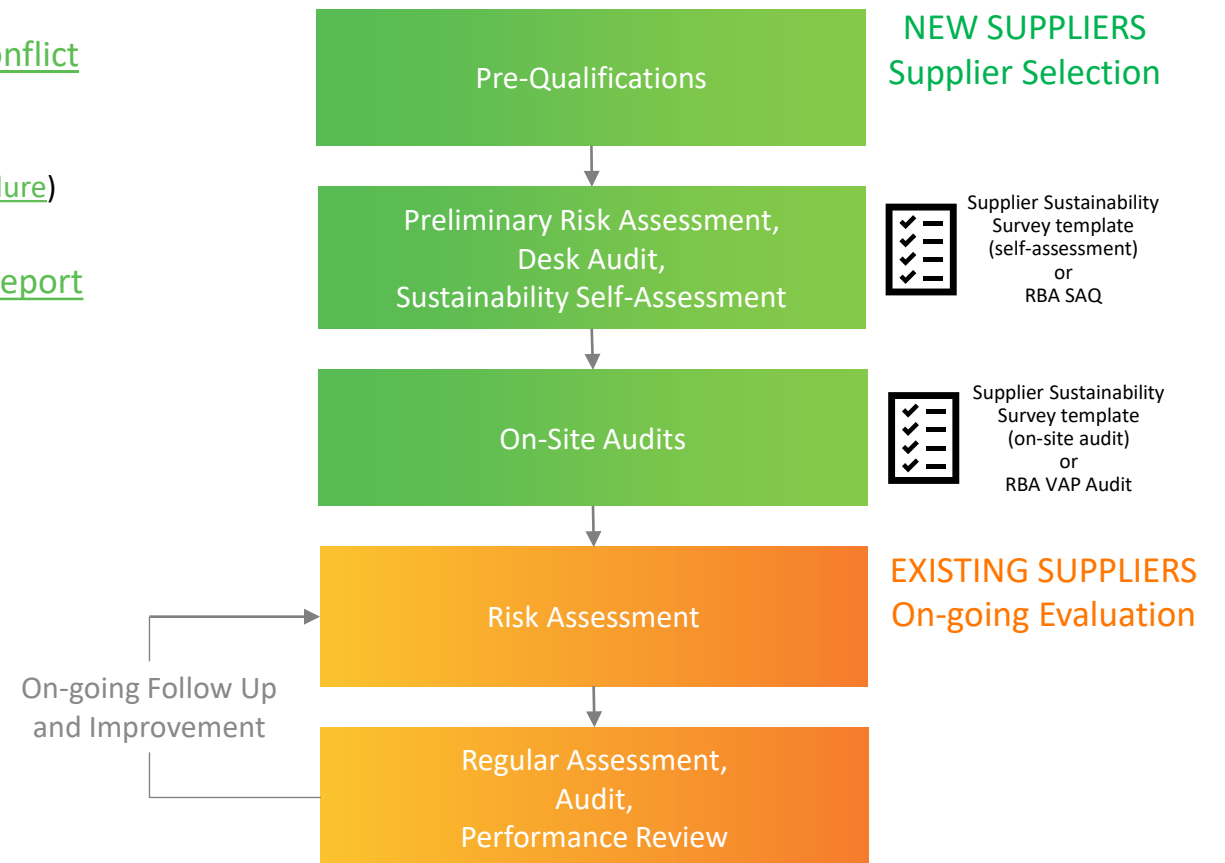
- CommScope Supply Agreement and/or [Terms & Conditions of Purchase](#)
- CommScope [Supplier Code of Conduct](#)
- CommScope [Code of Ethics & Business Conduct](#)
- CommScope key policies: [Labor Practices](#), [Anti-Corruption](#), [FCPA](#), [Conflict Minerals](#), [Environment](#), [Health and Safety](#)
- CommScope other applicable policies and procedures (example: [Restricted Substance List](#), [Environmental Product Compliance Procedure](#))
- CommScope [Supplier Quality Manual](#)
- CommScope encourages all of our stakeholders to [ask questions or report concerns](#).

Supplier Selection and Management process

- [Supplier Quality Manual](#)
- Supplier Selection – Procedure*
- Supplier Selection Checklist – Template*
- Supplier Risk Assessment – Template*
- Supplier Sustainability Survey – Template*
- Supplier Management – Procedure*

Refer to CommScope's [Sustainability Reports](#) for further details.

CommScope Supply Chain Due Diligence Process



Our Expectations from our Supply Chain

Meet	Meet CommScope’s contractual obligations (Terms & Conditions).
Comply	Comply with CommScope’s Supplier Code of Conduct (SCoC) and other relevant policies.
Drive	Drive your policies and programs to adhere to our SCoC.
Engage	Proactively engage in the Corporate Social Responsibility (CSR) audit process.
Pass	Pass all audits with integrity and transparency.
Address	Immediately address any findings or adverse impacts.
Do	Do the same in your supply chain.

Expect compliance to be verified through audits from CommScope and CommScope customers!

Supplier Code of Conduct Overview

Supplier Code of Conduct

CommScope's Supplier Code of Conduct establishes standards for our supply chain to ensure:

- Working conditions are safe.
- Workers are treated with respect and dignity.
- Business operations are environmentally responsible and conducted ethically.

CommScope's Supplier Code of Conduct contains provisions to address performance in the following areas:

- 4.1 Compliance with Laws
- 4.2 Compliance with CommScope Policies
- 4.3 Labor Practices and Human Rights
- 4.4 Health and Safety Practices
- 4.5 Environmental Practices
- 4.6 Ethical Practices
- 4.7 Management System
- 4.8 Additional Requirements

4.1 Compliance with Laws and Standards

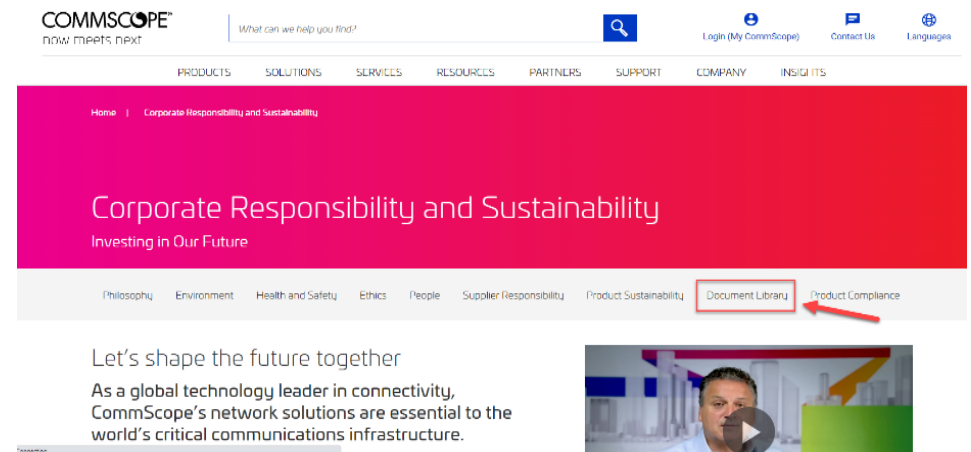
- CommScope suppliers must operate in full compliance with the applicable laws, rules, regulations, codes and ethical standards, including, but is not limited to,
 - environmental,
 - occupational health and safety,
 - ethics, and
 - labor practices.
- CommScope suppliers must require their suppliers (including labor and service agencies/agents) to do the same.



4.2 CommScope Policies and Procedures

- Suppliers must comply with the CommScope's published policies and procedures, and
- Suppliers should always consent to and comply with the latest version, which can be found in our online Document Library at:

<https://www.commscope.com/corporate-responsibility-and-sustainability/document-library/>



4.3 Labor Practice & Human Rights

- Focuses on the rights of all workers
- Addresses **human rights** of all workers
- Workers are treated with dignity and respect as understood by the international community
- Applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker
- Implement management systems such as SA8000 and ILO Guidelines on labor and human rights
- A third-party certification is encouraged
- Main topics:
 - 4.3.1. Freely Chosen Employment, Prohibition of Forced Labor
 - 4.3.2. Young Workers
 - 4.3.3. Working Hours
 - 4.3.4. Wages and Benefits
 - 4.3.5. Humane Treatment
 - 4.3.6. Non-Discrimination/Non-harassment
 - 4.3.7. Freedom of Association and Collective Bargaining



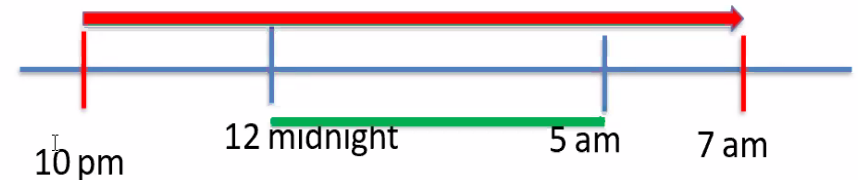
4.3.1. Freely Chosen Employment, Prohibition of Forced Labor

- **No forced**, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison **labor, slavery or human trafficking**
 - Including transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services
- **No unreasonable restrictions on workers' freedom of movement** in the facility in addition to unreasonable restrictions on entering or exiting supplier provided facilities
- All workers must be provided with a written **employment agreement** in the language workers can understand
- **All work must be voluntary**, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract, unless additional requirements in the local law
- Workers' **identity or immigration documents** shall **not be held** unless required by law
- Workers shall **not** be required to pay employers' or agents' **recruitment fees** or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker

4.3.2. Young Workers

- **Child labor not allowed** at any stage of manufacturing.
The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest
- If child labor is identified, assistance/remediation should be provided
- Implement an appropriate mechanism to verify the age of workers
- Legitimate workplace learning programs is supported (e.g. apprenticeship program)
 - Proper management of student workers and protection of students’ rights
- **Young Workers**
 - Under the age of 18, and over the age of Child
 - No dangerous/toxic work, no night shifts, no overtime, regular health checks

- ❑ **Night Work:** All work which is performed during a period of not less than **seven consecutive hours**, including the interval from **midnight to 5 a.m.** (ILO Convention 171)
- ❑ **Night Work for Young Workers:** In the case of young persons under sixteen years of age, this period shall include the interval between ten o'clock in the evening and six o'clock in the morning. (ILO Convention 90). In the case of young persons who have attained the age of sixteen years but are under the age of eighteen years, this period shall include an interval prescribed by the competent authority of at least **seven consecutive hours** falling between **ten o'clock in the evening and seven o'clock in the morning**.



4.3.3. Working Hours

- Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness
- Working hours **are not to exceed the maximum set by local law**
- A workweek should **not be more than 60 hours per week**, including overtime
 - except in emergency or unusual situations
- **All overtime must be voluntary**, unless additional requirements in local law
- Workers shall be allowed at least **one day off following every six consecutive working days**



4.3.4. Wages and Benefits

- **Compensation** must comply with applicable laws relating to wages and benefits:
 - minimum wages
 - overtime pay/rate
 - equal pay for equal work and qualification
 - legally mandated benefits
- **No disciplinary deductions** from wages as a disciplinary measure are allowed
- **Timely and understandable wage statements are provided to workers** that includes sufficient information to verify accurate compensation for work performed, e.g. pay stub or similar documents
- **All use of temporary, dispatch and outsourced labor** shall be within the limits of the local law



4.3.5. Humane Treatment

- **No harsh or inhumane treatment**
 - No violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers
 - Nor the threat of any such treatment
- **Disciplinary policies and procedures** in support of these requirements shall be clearly defined and communicated to workers

4.3.6. Non-Discrimination/Non-Harassment

- Commit to a workplace **free of harassment and unlawful discrimination**
- Companies shall **not engage in discrimination or harassment** based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status **in hiring and employment practices** such as wages, promotions, rewards, and access to training
- Workers shall be provided with **reasonable accommodation for disability or religious practices**
- Workers or potential workers should not be subjected to **medical tests or physical exams that could be used in a discriminatory way**
- Promote **equal opportunities**



4.3.7. Freedom of Association and Collective Bargaining

- Respect workers rights to:
 - Form and join trade unions of their own choosing
 - Bargain collectively
 - Engage in peaceful assembly
 - Respect the right of workers to refrain from such activities
 - Openly communicate and share ideas and concerns with management regarding working conditions and management practices **without fear of discrimination, reprisal, intimidation, or harassment**
 - Elect and join alternate lawful forms of worker representations where above rights are restricted by local law
- Company is responsible for ensuring their workers can exercise their rights to organize in a climate free of violence, pressure, fear, and threats

4.4 Health and Safety Practices

- Focuses on providing a **safe and healthy work and living environment** for all workers and the communities where they operate
 - In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment:
 - enhances the quality of products and services,
 - consistency of production,
 - worker retention and morale.
- **Ongoing worker input and education** are essential to identifying and solving health and safety issues in the workplace
- Implement management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health
- A third-party certification is encouraged
- Main topics
 - 4.4.1. Occupational Health and Safety
 - 4.4.2. Emergency Preparedness
 - 4.4.3. Occupational Injury and Illness
 - 4.4.4. Industrial Hygiene
 - 4.4.5. Physically Demanding Work
 - 4.4.6. Machine Safeguarding
 - 4.4.7. Sanitation, Food and Housing
 - 4.4.8. Health and Safety Communications



4.4.1. Occupational Safety

- **Identify and assess** potential health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.)
- **Mitigate** potential health and safety hazards :
 - eliminating the hazard
 - substituting processes or materials
 - controlling through proper design
 - implementing engineering and administrative controls
 - preventative maintenance and safe work procedures (including lockout/tagout, PPEs, etc.)
 - providing ongoing occupational health and safety training
- Provide workers with **personal protective equipment (PPE)**, and **educational materials** about risks to them associated with these hazards
- Take gender-responsive measures for pregnant women and nursing mothers:
 - Remove from working conditions with high hazards
 - remove or reduce any workplace health and safety risks
 - provide reasonable accommodations for nursing mothers
- Workers are encouraged to report any health and safety related concerns and suggestions

4.4.2. Emergency Preparedness

- **Identify and assess** potential emergency situations and events, and **minimize impacts** by implementing **emergency plans and response procedures**:
 - emergency reporting
 - employee notification
 - evacuation procedures
 - worker training,
 - drills (annually, or as required by local law, whichever is more stringent)
 - fire detection and suppression equipment
 - clear and unobstructed egress, adequate exit facilities
 - emergency responders
 - recovery plans
- Focus on minimizing harm to life, the environment and property

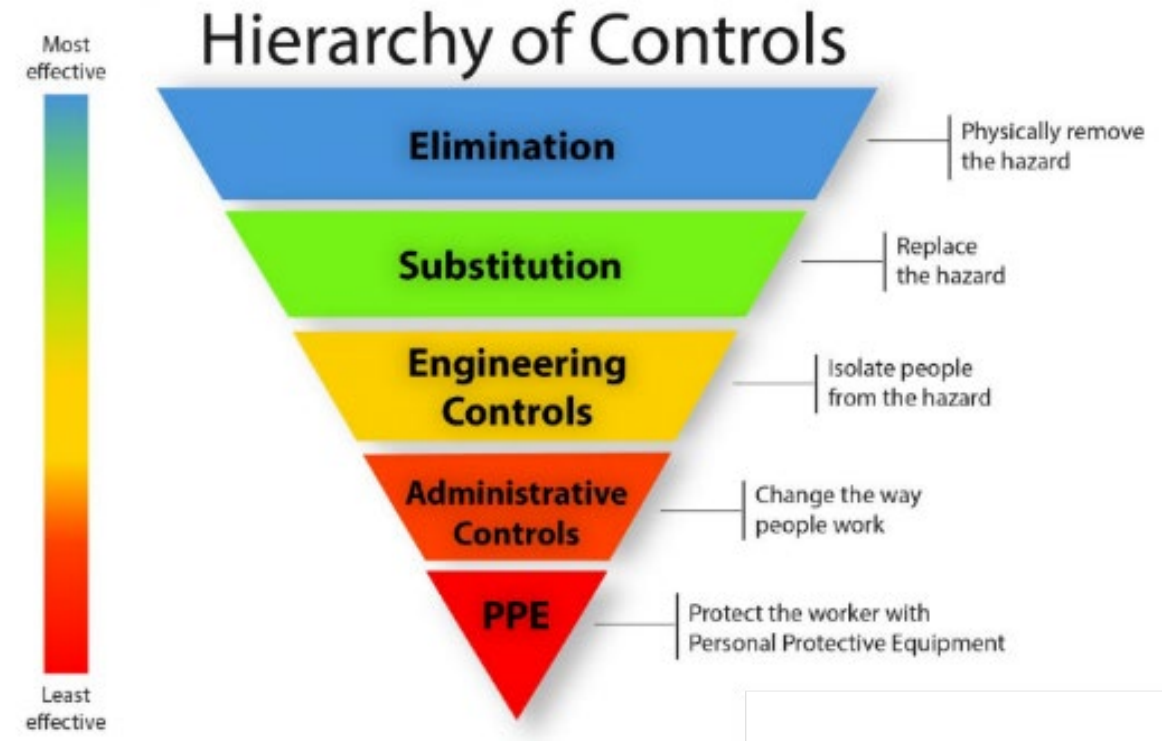


4.4.3. Occupational Injury and Illness

- Procedures and systems shall be in place to **prevent, manage, track and report occupational injury and illness**, including:
 - encourage worker reporting
 - classify and record injury and illness cases
 - provide necessary medical treatment
 - investigate cases and implement corrective actions to eliminate their causes
 - facilitate the return of workers to work
- **Workers are allowed to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation**
- **Actions:**
 - All required **permits, licenses and test reports (including health checks)** are in place and up to date
 - **Investigations** to determine root cause(s) and implement corrective/preventive actions
 - **First aid** process and adequate number of first responder
 - **First respond equipment and first aid kits** (inspection records up to date)
 - **Near Misses** records and tracking system
 - **Occupational health checks** (pre-job, on-the-job, and post-job)

4.4.4. Industrial Hygiene

- **Identify, evaluate, and control potential hazards** (chemical, biological, and physical agents) according to the Hierarchy of Controls
 - risk assessment and controls
- **Eliminate and/or reduce the potential hazards**
 - proper design, engineering and administrative controls
- Provide appropriate, well-maintained, personal protective equipment (PPE) free of charge
- Systematic monitoring and evaluation workers' health and working environments
- Ongoing protective programs and education in place



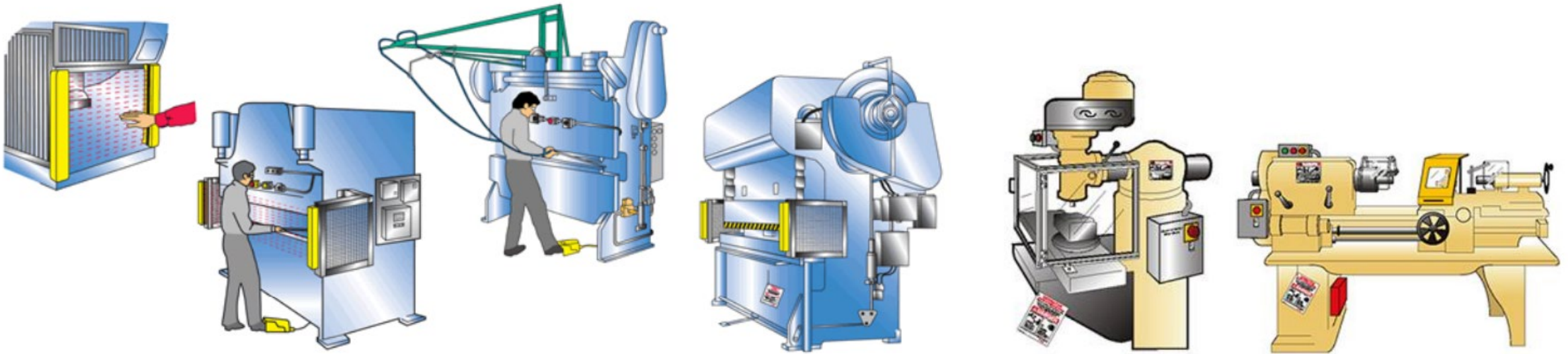
4.4.5. Physically Demanding Work

- Proactive **identify, evaluate, and control** worker exposure to the hazards of physically demanding tasks:
 - manual material handling
 - heavy or repetitive lifting
 - prolonged standing
 - highly repetitive or forceful assembly tasks



4.4.6. Machine Safeguarding

- Production and other machinery shall be **evaluated** for safety hazards
- Physical guards, interlocks, and barriers shall be **provided** and properly **maintained** where machinery presents an injury hazard to workers



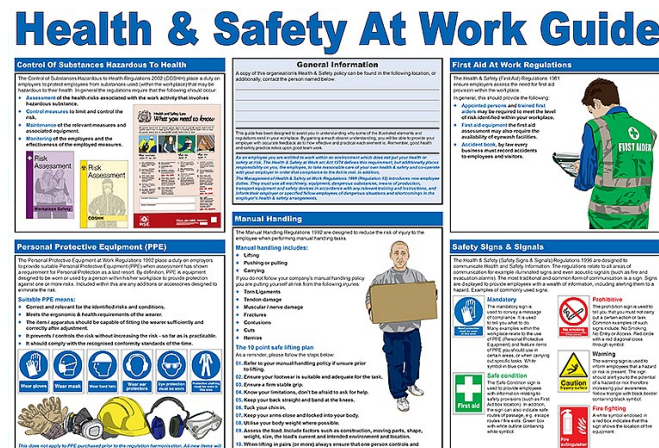
4.4.7. Sanitation, Food and Housing

- Provide workers with access to
 - clean toilet facilities
 - potable water
 - sanitary food preparation, storage, and eating facilities
- Dormitories
 - clean and safe
 - appropriate emergency egress
 - hot water for bathing or showering
 - adequate lighting and conditioned ventilation
 - individually secured accommodations for storing personal and valuable items
 - reasonable personal space
 - reasonable entry and exit privileges
- Kitchen and Canteen
 - permits, licenses, certificates, registrations
 - sanitary food preparation, storage, and dining facilities
 - emergency egress and equipment



4.4.8. Health and Safety Communication

- Provide workers with health and safety information and training **in the language the workers can understand**
 - mechanical, electrical, chemical, fire, physical hazards, and others
 - include content on specific risks to relevant demographics, such as gender and age
- Display health and safety related information at the workplace
- Provide training to all workers prior to the beginning of work and regularly thereafter
- Encourage workers to raise any health and safety concerns without retaliation



4.5. Environmental Practices

- Environmental responsibility is integral to producing world-class products
- **Identify** the environmental impacts and **minimize** adverse effects on the community, environment, and natural resources within **manufacturing operations, products and service**, while safeguarding the health and safety of the public
- Implement recognized management systems such as ISO 14001 or the Eco Management and Audit System (EMAS)
- A third-party certification is encouraged
- Main topics
 - 4.5.1. Environmental Permits and Reporting
 - 4.5.2. Pollution Prevention and Resource Conservation
 - 4.5.3. Hazardous Substances
 - 4.5.4. Solid Wastes
 - 4.5.5. Air Emissions
 - 4.5.6. Materials Restrictions
 - 4.5.7. Water Management
 - 4.5.8. Energy Consumption and GHG Emissions



4.5.1. Environmental Permits and Reporting

- Permits (e.g. wastewater discharge, air emissions, etc.), approvals, and registrations are to be **obtained, maintained, and kept current** and their operational and reporting requirements are to be followed
- Report to environmental authorities according to local laws



4.5.2. Pollution Prevention and Resource Conservation

- **Minimize or eliminate emissions** and discharges of pollutants and generation of waste
 - Adding pollution control equipment, modifying production, maintenance and facility processes, or other means
- **Conserve the use of natural resources** (water, fossil fuels, minerals, and virgin forest products):
 - Modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means
- **Programs** in place, including objectives and targets, to identify, manage, minimize or eliminate at the source emissions and discharges of pollutants and generation of waste and conserve the use of natural resources



4.5.3. Hazardous Substances

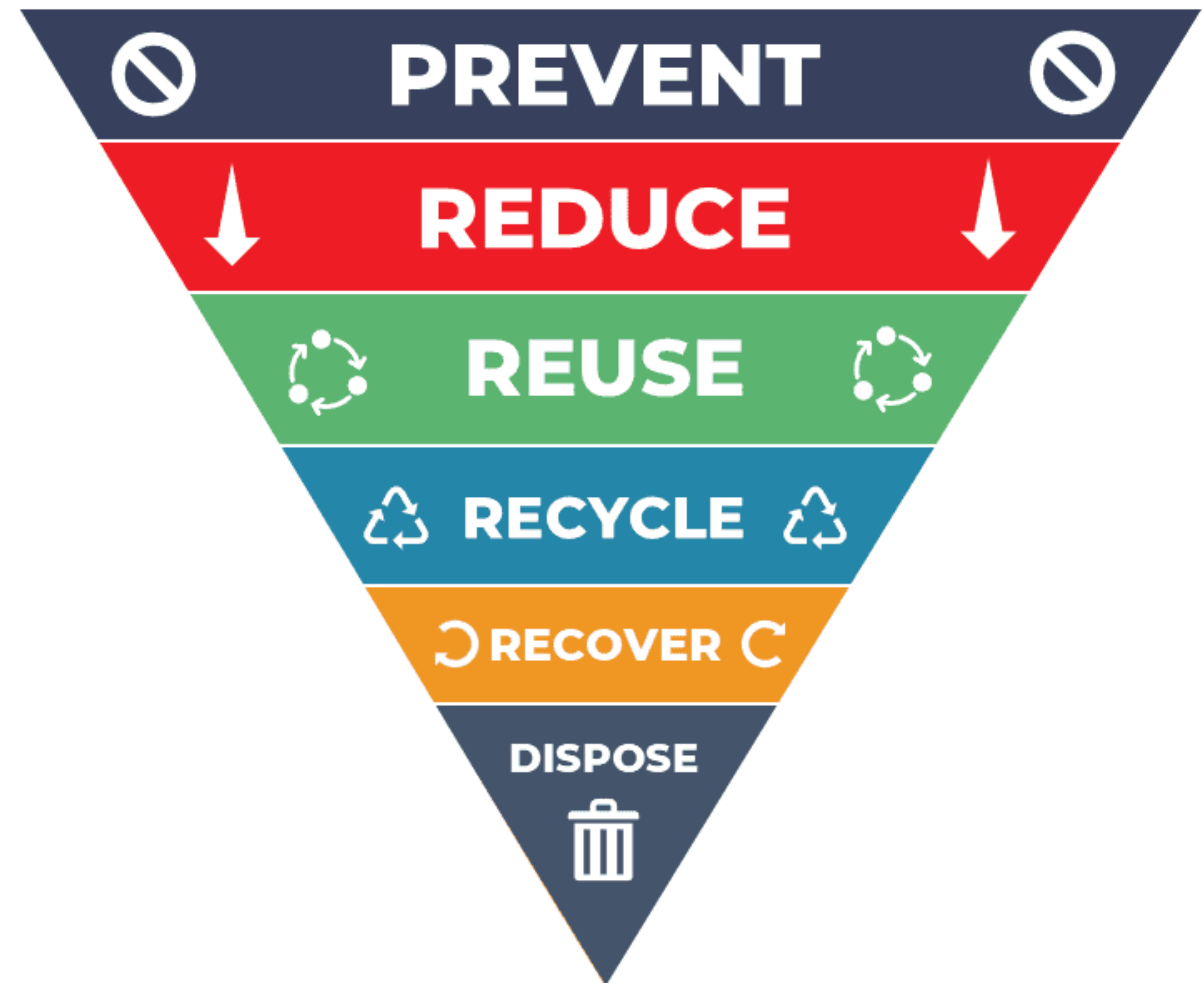
- **Identify, label, manage and recycle** chemicals, waste, and other materials posing a hazard to humans or the environment
- **Safe handling, movement, storage, use, recycling or reuse and disposal**
- **Track and document hazardous waste data**



4.5.4. Solid Waste

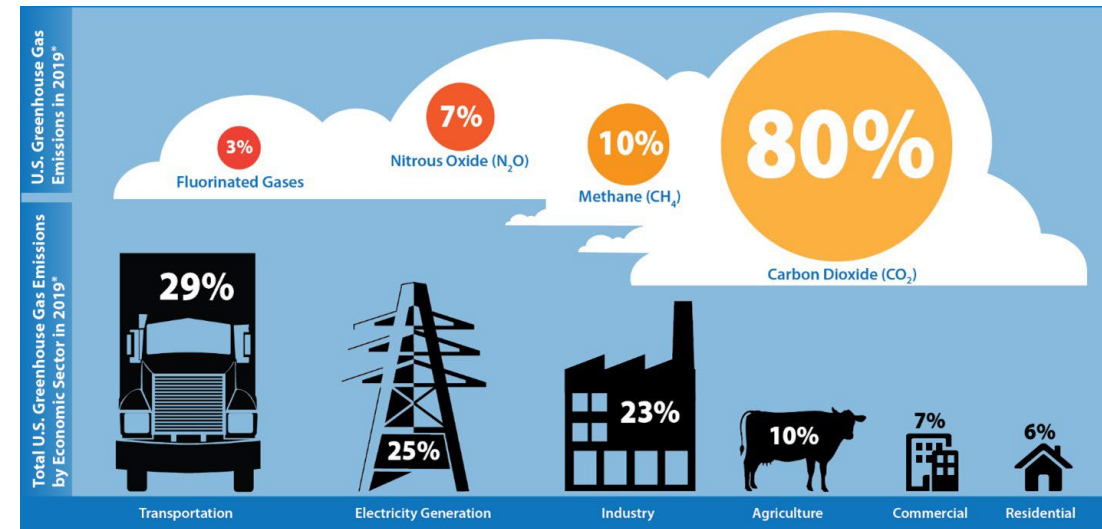
- Implement a systematic approach to **identify, manage, reduce**, and responsibly **dispose** of or **recycle** solid waste (non-hazardous and hazardous)
- **Track and document waste data**

 WASTE MANAGEMENT



4.5.5. Air Emissions

- **Air emissions to be characterized, routinely monitored, controlled, and treated** as required prior to discharge:
 - volatile organic chemicals (VOCs), aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts
- **Ozone-depleting substances (ODS)** are to be effectively managed:
 - halohydrocarbons: CFCs, halons, CCl_4 , CH_3CCl_3 , HCFC, $\text{C}_x\text{H}_x\text{FBr}$, CH_2BrCl , CH_3Br , and others
 - where used: refrigerant, cleaning agent, foaming agent, extinguishant, disinfectant, etc.
- **Routine monitoring** of the performance of air emission control systems



4.5.6. Materials Restrictions and Product Content

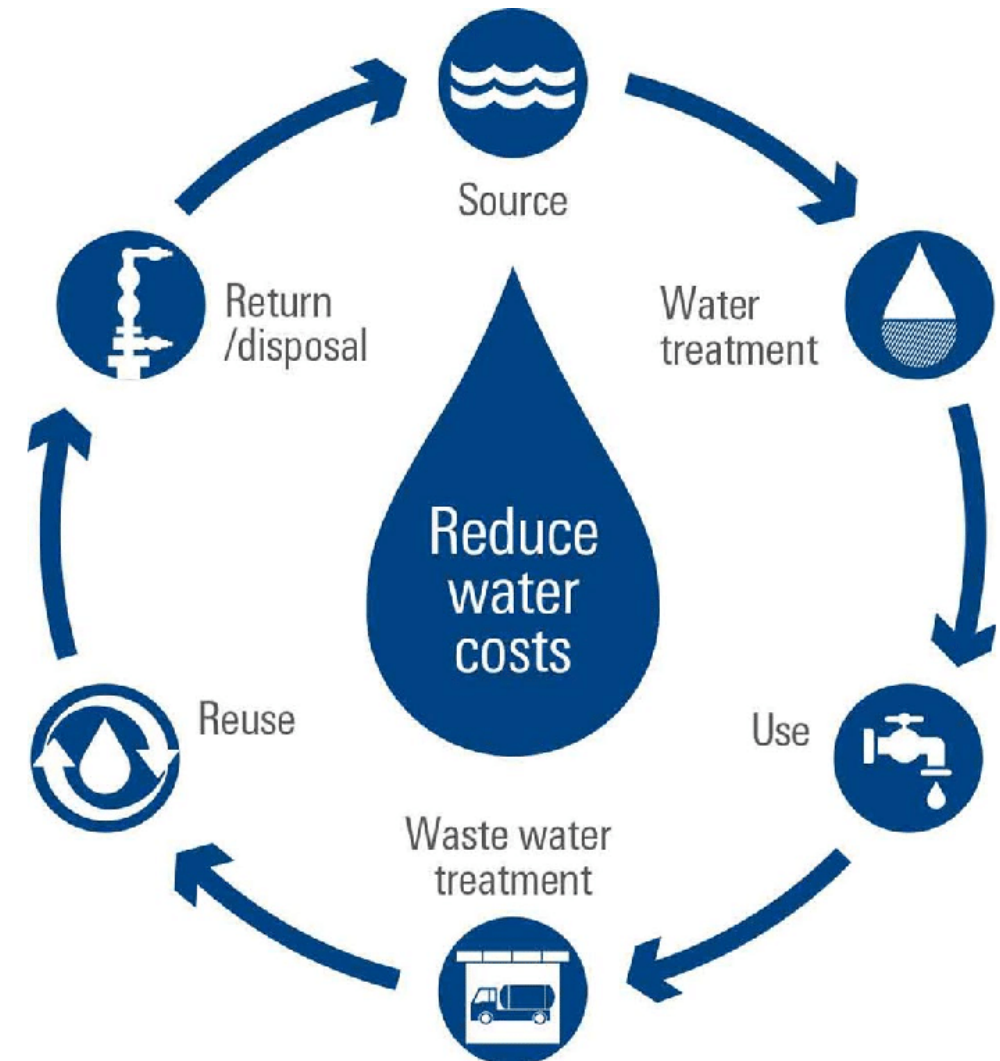
- Adhere to all applicable laws, regulations, and CommScope requirements
 - prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal
 - CommScope Restricted Substance List:

<https://www.commscope.com/corporate-responsibility-and-sustainability/document-library/#supplier-responsibility>



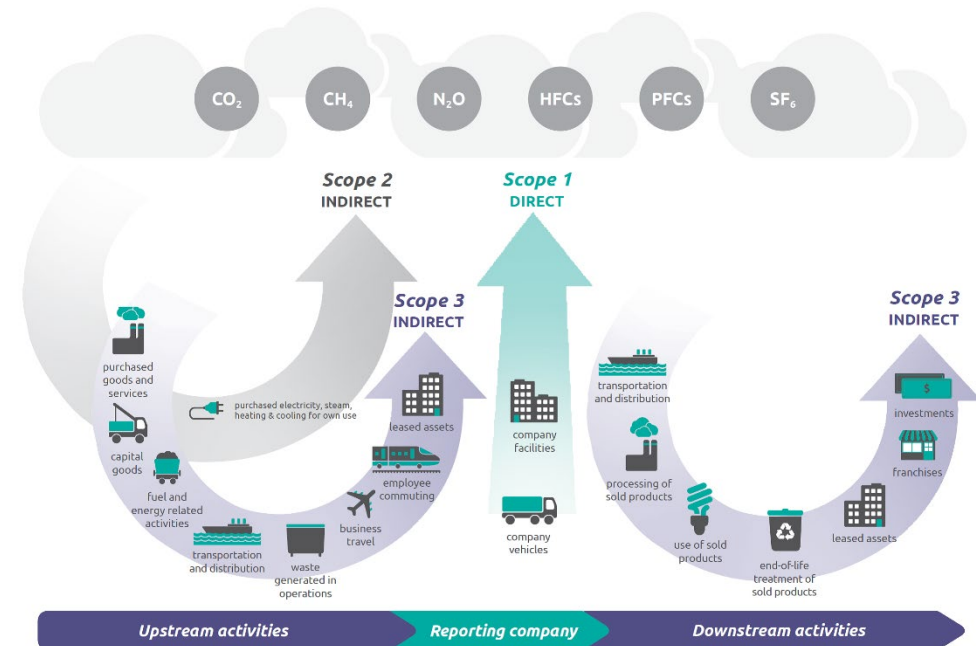
4.5.7. Water Management

- **Implement a water management program:**
 - document, characterize and monitor water sources, use and discharge
 - seeks opportunities to conserve water
 - control channels of contamination
- All wastewater is to be **characterized, monitored, controlled, and treated** as required prior to discharge or disposal
- **Routinely monitor** wastewater treatment and containment systems to ensure optimal performance and regulatory compliance



4.5.8. Energy Consumption, Climate Changes & GHG Emissions

- **Establish** an absolute corporate-wide greenhouse gas (GHG) emissions **reduction goal**.
 - Greenhouse gases:
 - carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆)
- **Identify, monitor and minimize** all relevant GHG emissions at the facility and/or corporate level
 - Scope 1: direct GHG emissions: combustion, fuel, vehicles, refrigeration equipment, extinguishant, process chemicals/gases
 - Scope 2: indirect GHG emissions: consumption of purchased electricity, heat or steam
 - Scope 3: other indirect GHG emissions from upstream and downstream activities (e.g. purchased goods and services, transportation, waste generated in operations, travel, commuting, use of sold products, end of life product treatment, etc.)
- **Track, document and publicly report** energy consumption and all Scopes 1, 2 and significant categories of Scope 3 GHG emissions
- **Implement** cost-effective methods to improve energy efficiency and minimize energy consumption and GHG emissions



4.6. Ethics Practices

- To meet social responsibilities and achieve success in the marketplace, CommScope suppliers should uphold the highest standards of ethics, including:
 - 4.6.1. Business Integrity, Anti-bribery and anti-corruption
 - 4.6.2. Conflict of Interest
 - 4.6.3. Disclosure of Information
 - 4.6.4. Intellectual Property
 - 4.6.5. Fair Business, Advertising & Competition
 - 4.6.6. Protection of Identity and Non-Retaliation
 - 4.6.7. Privacy
 - 4.6.8. Responsible Sourcing of Minerals
- Implement management systems such as ISO37001 and global standards on ethics
- A third-party certification is encouraged



4.6.1. Business Integrity, Anti-bribery and Anti-corruption

- Uphold the **highest standards of integrity** in all business interactions
- **Zero-tolerance policy** to prohibit any and all forms of bribery, corruption, extortion and embezzlement
- **No bribes** or other means of obtaining undue or improper advantage
 - this prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party
- Implement monitoring, record keeping, and enforcement procedures to ensure **compliance with anti-bribery and anti-corruption laws**, including but not limited to:
 - the United States (U.S.) Foreign Corrupt Practices Act, as amended
 - the United Kingdom (U.K.) Bribery Act



4.6.2. Conflict of Interest

- **Avoid** actual, potential or perceived **conflicts of interest** with CommScope employees
- If these occur, supplier must **disclose** such a conflict
- What is a conflict of interest?
A conflict of interest occurs when your personal interests override or compete with the best interests of our organization.



4.6.3. Disclosure of Information

- All business dealings should be performed **transparently** and **accurately**
- **Information to be disclosed** in accordance with applicable regulations and prevailing industry practices
 - labor, health and safety, environmental practices, business activities, structure, financial situation, and performance
- **No misreporting, no falsification of records or misrepresentation**



4.6.4. Intellectual Property

- **Intellectual property rights shall be respected**
- Transfer of technology and know-how is to be done in a manner that protects intellectual property rights
- Safeguard CommScope, supplier's affiliates and business partners' information
- Observe and respect all CommScope patents, trademarks and copyrights
- Don't transmit confidential or proprietary information of CommScope via the internet unless such information is encrypted accordance with minimum standards established by CommScope



4.6.5. Fair Business, Advertising and Competition

- **Uphold standards of fair business, advertising, and competition**
- Comply with anti-trust and fair competition laws
- Disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws



4.6.6. Protection of Identity and Non-Retaliation

- **Establish** and **implement** programs to ensure the confidentiality, anonymity and protection of all whistleblowers are maintained unless prohibited by law
- **Inform** your employees and business partners about the process to understand they can raise any concerns without fear of retaliation



4.6.7. Privacy

- **Commit to protecting** the reasonable **privacy** expectations of personal information of everyone they do business with, including:
 - ✓ suppliers
 - ✓ customers
 - ✓ consumers
 - ✓ employee
- Comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared



4.6.8. Responsible Sourcing of Minerals

- Develop and implement a policy and **exercise due diligence** to reasonably assure that **Tantalum, Tin, Tungsten, Gold and Cobalt (3TG+C)** in the products you manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses
- Pass requirements down to your suppliers through supplier agreements, contract requirements and encourage suppliers to use certified sourcing
- Provide CommScope with required information using the industry **standard Conflict Minerals Reporting Template (CMRT)** and/or **Extended Minerals Reporting Template**



TIN



TANTALUM



TUNGSTEN



GOLD



COBALT

4.7. Management System

- A **management system** is the framework of policies, processes and procedures used to ensure that an organization can fulfill all tasks required to achieve its objectives
- Suppliers shall adopt or establish a management system.
- The management system shall be designed to ensure:
 - compliance with applicable laws, regulations and CommScope requirements
 - identification and mitigation of operational risks related to the Code.
- The system should also facilitate continual improvement
- Implement management systems aligned with standards such as ISO14001, ISO45001, ISO37001, ISO19600, SA8000, etc.
- A third-party certification is encouraged

Management System Elements

- 4.7.1. Company Commitment
- 4.7.2. Management Accountability and Responsibility
- 4.7.3. Legal and Customer Requirements
- 4.7.4. Risk Assessment and Risk Management
- 4.7.5. Improvement Objectives
- 4.7.6. Training
- 4.7.7. Communication
- 4.7.8. Worker/Stakeholder Engagement and Access to Remedy
- 4.7.9. Audit and Assessments
- 4.7.10. Corrective Action Process
- 4.7.11. Documentation and Records
- 4.7.12. Supplier Responsibility



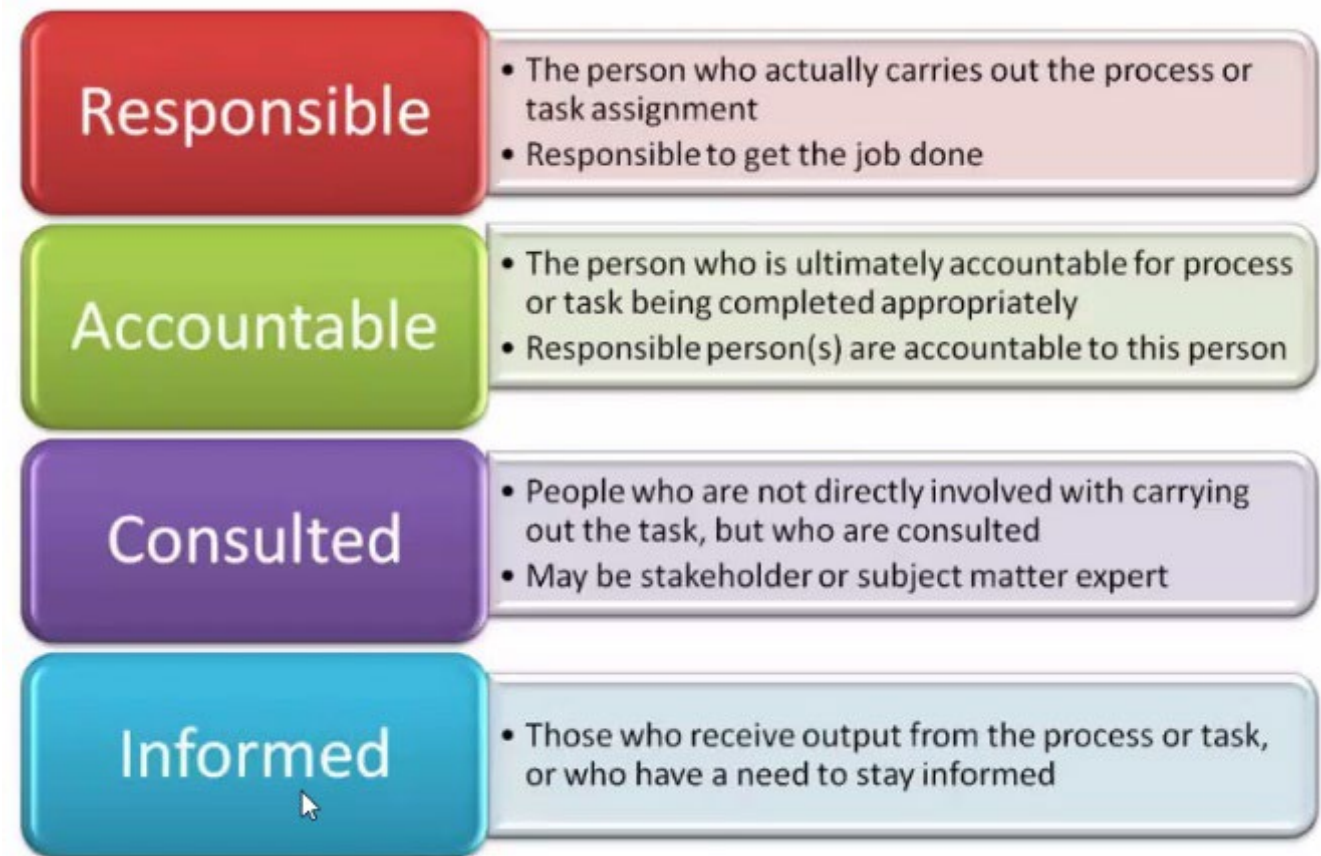
4.7.1. Company Commitment

- Corporate human rights, health and safety, environmental and ethics policy statements affirming supplier's commitment to compliance, due diligence and continual improvement, **endorsed by executive management**:
 - policy statements covering human rights, health and safety, environmental and ethics
 - posted in the facility and communicated to workers in a language they understand via accessible channels
 - organization chart
 - management review



4.7.2. Management Accountability and Responsibility

- Identify **senior executive and company representative(s)** responsible for ensuring implementation of the management systems
- Senior management reviews the status on a regular basis



4.7.3. Legal and Customer Requirements

- Establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements (Labor, Environment, Health and Safety, Ethics)



Examples:

- Universal Declaration of Human Rights
- United Nations (UN) Global Compact
- UN Standards and Principles
- International Labor Organization (ILO) Standards and Principles
- United Nations Children's Fund (UNICEF) Standards and Principles
- World Health Organization (WHO) Standards and Principles
- Global Reporting Initiative (GRI) Standards
- Sustainability Accounting Standards Board (SASB) Standards
- Modern Slavery Reporting (Australia, U.K., EU)
- EU Restriction of Hazardous Substances (RoHS) Directive
- EU Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation
- EU Waste Electrical and Electronic Equipment (WEEE) Directive
- U.K. Bribery Act
- U.S. Foreign Corrupt Practices Act (FCPA)
- EU Directive on Corporate Sustainability Due Diligence
- Country specific legislation worldwide
- Customer requirements
- International Organization for Standardization (ISO) standards
- Others

4.7.4. Risk Assessment and Risk Management

- Process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks:
 - including the risks of severe human rights and environmental impacts
 - determine the significance for each risk
 - implement procedural and physical controls
 - control the identified risks and ensure regulatory compliance

	Risks	Risk description	Respo nsible	Risk Assessment			Plan action	Effectiveness assessment	Comments
				Likelihood (L)	Severity (S)	Risk level (=L*S)			
Labor	Forced Labor	Debt bondage, slavery or human trafficking							
		Workers paid recruitment fees for their employment, and was not compensated.							
		Hold workers' identity							
		Foreign workers are not provided contract in their language							
		Reasonable movement in the facilities is restricted							
		Involuntary overtime work							
		Abuse or threaten to abuse							
		Wage deductions as a disciplinary measure.							



4.7.5. Improvement Objectives

- Written performance objectives, targets and implementation plans to improve social, environmental, and health and safety performance
- Periodic assessment of performance in achieving those objectives



4.7.6. Training

- Programs for **training managers and workers** to implement policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements
- Training needs analysis/assessment (TNA) is recommended to determine the gap between the current and desired knowledge skills and abilities of employees
- Formal training programs for managers and workers including:
 - New employee orientation
 - Training needs analysis
 - Training plan
 - Training materials
 - Training records
 - Training frequency
 - Training effectiveness verification



4.7.7. Communication

- Process for communicating clear and accurate information about your policies, practices, expectations and performance to workers, suppliers and customers
 - Internal communication: all employees, management and BOD
 - External communication: customer and suppliers
 - Compliance monitoring process



4.7.8. Worker/Stakeholder Engagement and Access to Remedy

- Ongoing two-way communications with
 - workers
 - their representatives
 - other stakeholders
- Obtain feedback on operational practice and conditions covered by this Code
- Foster continuous improvement
- Workers must be given a safe environment to provide grievance and feedback **without fear of reprisal or retaliation**



4.7.9. Audits and Assessments

- Periodic **self-evaluations** to ensure conformity to legal and regulatory requirements, the content of the Code and CommScope contractual requirements related to social and environmental responsibility
- Cooperate with external audits requested by CommScope or CommScope customers

4.7.10. Corrective Action Process

- Process for timely **correction of deficiencies** identified by internal or external assessments, inspections, investigations and/or reviews



4.7.11. Documentation and Records

- Creation and maintenance of documents and records to ensure compliance (documented evidence) with:
 - Regulatory
 - Company requirements
 - Confidentiality to protect privacy



4.7.12 Supplier Responsibility

- **Communicate the Code requirements** to the next tier suppliers
- Implement an adequate and effective process to ensure the next tier suppliers implemented the Code requirements
- Assess and monitor your suppliers for compliance with the Code requirements, their performance and continuous improvement where deficiencies are identified

Has your company implemented a **SUPPLIER Code of Conduct** that covers sustainability/CSR standards?

Does your company place **contractual requirements** on your SUPPLIERS (including service agencies) to comply with current sustainability/CSR laws, regulations, or codes of conduct?

Has your company implemented a program to **assess risks** and manage the identified risks relating to the sustainability/CSR practices of your SUPPLIERS (including service agencies)?

4.8 Additional Requirements/Sections

4.8.1 Export Sanctions / Terrorism Activities

4.8.2 Data and Information Provision by Suppliers

4.8.3 Solicitation by Suppliers

4.8.4 Monitoring and Compliance



4.8.1 Export Sanctions / Terrorism Activities

- Comply with the U.S. and all applicable international economic sanctions laws and regulations, as well as all applicable U.S. and international export controls applicable to CommScope or supplier
- Provide all information required by CommScope to comply with the U.S. and international sanctions. Specifically, suppliers are required to provide clear and convincing evidence that demonstrates the identity and location of all sub-tier suppliers involved in materials, components, goods, or articles provided to CommScope.
- Do not conduct business with individuals, entities, organizations, or countries that are the targets of the U.S. or applicable international economic sanctions laws and regulations, including but not limited to the SDN list (<https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-list-data-formats-data-schemas>)
- Never participate in any boycott or restrictive trade practice in violation of the U.S. anti-boycott laws
- Do not directly or indirectly engage in or support any terrorist activity or money laundering

4.8.2 Data and Information Provision by Suppliers

- **Provide relevant data and information required by CommScope to comply with the applicable laws, regulations and standards:**
 - the EU Carbon Border Adjustment Mechanism (CBAM) data
 - energy consumption
 - GHG reduction targets, Scope 1, 2 and significant categories of Scope 3 GHG emissions
 - carbon footprint and cradle-to-grave operational data
 - product content and material ingredient report
 - country of origin
 - country of manufacture
 - supply chain due diligence and actions taken
 - evidences to demonstrate compliance with modern slavery, forced labor, child labor and other sustainability related legislations
 - others



4.8.3 Solicitation by Suppliers

- Comply with all guidelines issued by CommScope relating to access to CommScope facilities, offices and departments, and employees
- Don't use CommScope's computer system, including its electronic mail system and internet site, for purpose of sending unsolicited electronic mail messages to the CommScope community
- Suppliers must receive prior written authorization from CommScope Supply Chain management to hold trade shows, demonstrate products, utilize CommScope's resources (i.e. bulletin boards), or make unsolicited calls on CommScope departments



4.8.4 Monitoring and Compliance

- **Support CommScope due diligence activities** to monitor and assess supplier's compliance status:
 - on-site audits and inspections of facilities
 - use of questionnaires
 - review of publicly available information
 - or other measures
- **Notify** CommScope's Supply Chain management when any violations occur
- **Violation of this Code may lead to business relationship disqualification or termination**



Reporting Concerns

- Suppliers are encouraged to report concerns about illegal, unethical or improper conduct without fear of retaliation.
- Reporting methods:
 - Email CommScope Corporate Ethics and Compliance Officer at ethics@commscope.com
 - Submit a confidential report using CommAlert®. Where permitted by applicable law, CommAlert supports anonymous reporting.
 - In the U.S., dial 866-277-2410. Calls from outside the U.S. require a [country-specific code](#)
 - Visit commalert.alertline.com or for locations in the EU, commalert-europe.alertline.com



Backup Information

RBA Code of Conduct

The Responsible Business Alliance (RBA)

- formerly the Electronic Industry Citizenship Coalition (EICC)
- the world's largest industry coalition dedicated to corporate social responsibility in global supply chains

The RBA Code of Conduct

- Establishes standards to ensure:
 - working conditions in the electronics industry and its supply chain are safe
 - workers are treated with respect and dignity
 - business operations are environmentally responsible and conducted ethically
- Five sections:
 - Labor
 - Health and Safety
 - Environment
 - Ethics
 - Management System(s) for the 4 sections listed above

RBA Members

<https://www.responsiblebusiness.org/about/members/>

EU Corporate Sustainability Due Diligence Directive (CSDDD)

- **Obligations for companies:**

- Human rights and environmental due diligence with respect to their operations, subsidiaries, and value chain (direct and indirect)
- To adopt and put into effect a transition plan for climate change mitigation, per global target of limiting global warming to 1.5°C
- Liabilities for violations of due diligence obligations

- **Timeline:**

- Entry into force of Directive: July 25th, 2024
- Application date:
 - 3 years after entry into force (companies with 5,000+ employees and EUR 1,5+ billion turnover)_ 2027
 - 4 years (companies with over 3,000 employees and EUR 900 million turnover) _ 2028
 - 5 years (companies with over 1,000 employees and EUR 450 million turnover)_ 2029

- **Actions:**

- Responsible business conduct (policy and management system)
- Identify and assess actual or potential adverse impacts in the company's operations, supply chains and business relationships
- Cease, prevent and mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for or cooperate in remediation when appropriate

Thank you.

CR&S Team

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