COMMSCOPE

Electronic Approvals

Product Compliance (PC) - Responsible Minerals Sourcing - Policy

Owner: Sr Dir, Product Sustainability & Compl • Global Product Document No: COMM-PC-1001

Compliance

Approver: Sr. Manager, Global Trade Program • Legal Ethics Revision Date: 31 Jan 2025

Sustainability & Compliance

Approver: SVP, Operational Excellence • Executive Division - Corporate Quality

Approver: VP, & Assoc Gen Cnsl, Corp & Sec • Securities, M&A, Corporate Governance

Approver: Dir., Corp. Consolidation & Reporting • Corporate Accounting and Finance

Approver: VP, Procurement CTRO & Ops • Procurement CTRO & Ops

Approver: Director, Corporate Responsibility • Executive Division - CS Finance & Administration

"Conflict Minerals" and "Extended Minerals" are considered "Responsible Minerals" under this policy. Reasonably ensuring the products CommScope manufactures are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas is important to CommScope's core values.

In line with CommScope's Code of Ethics and Business Conduct, we support 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 are 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.

In addition, CommScope is committed to responsibly sourcing Extended Minerals as identified and defined by the Responsible Business Alliance (RBA) and Responsible Minerals Initiative (RMI) and voluntarily adopts this policy and exercises due diligence on the source and chain of custody of the Extended Minerals together with the Conflict Minerals.

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

- Being a participating member of the Responsible Minerals Initiative (RMI) and Responsible Business Alliance (RBA), and contributing to independent third-party audits and due diligence programs of Conflict Minerals and Extended 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.
- Avoiding the use of Extended Minerals which directly or indirectly finance or benefit the illegal armed groups in conflict affected and high-risk areas.
- 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.
- Conducting reasonable country of origin inquiries into the source of any Extended Minerals included in our products to determine whether any of the Extended Minerals originated in conflict affected and high-risk areas.
- Where required, implementing appropriate due diligence and reporting processes with respect to the source and chain of custody of Conflict Minerals and Extended Minerals. and
- Obligating our suppliers to ensure 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 responsibly sourcing Extended Minerals. CommScope's suppliers are required to cooperate with CommScope to ensure legal obligations are met. Suppliers are also responsible for passing the same requirements to their suppliers.

- Do not contain Conflict Minerals and Extended Minerals that are necessary to their production or functionality, or
- If they do contain Conflict Minerals and Extended 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 and high-risk areas.

CommScope evaluates relationships with our suppliers on an ongoing basis to ensure continued compliance with this policy. CommScope reserves the right to request additional documentation from suppliers. Traceability data shall be maintained and provided to CommScope on demand.



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Revision Date:	31 Jan 2025

Revision History

Release Date	DCR	Revisions
26 May 2017	101416-1	New Corporate Global quality document • previously LEGL.POL.110
18 Nov 2020	2020- 10-06_08:49	Update to COMM-PC-1001 and alignment to the ARRIS/Ruckus conflict mineral policy. Commitment section addition of RMI member. Responsibility sentence added. Previous Identification: CS-EPC-1001. Owner: Vinatha Viswanathan (Director, Product Safety & Compliance)/Approvers: David Hoffman (VP, QA Engineering) • Sharon Wood (VP, Quality) • Adam Silverstein (VP, Quality) • Joe Palmeri (VP, Chief Procurement Officer) • William Pleasant (VP, & Deputy General Counsel) • Laurie Oracion (VP, Corporate Accounting) • Doug Palmer (VP, Home Networks Quality)
31 Jan 2025	2024- 1115-1146	Update to include extended minerals. broaden policy to responsible sourcing minerals policy. update Owner title and approvers names and titles. Changed document Title from(PC) Confilct Minerals - Policy TO(PC) - Responsible Minerals Sourcing - Policy Change Requested by_Joee Kvetensky (Sr Mgr, Product Sustainability & Compl) OWNER_Vinatha Viswanathan (Sr Dir, Product Sustainability & Compl) APPROVERS_Bess Motter (Sr. Manager, Global Trade Program) • Boris Kokotovic (SVP, Operational Excellence) • Michael Coppin (VP, & Assoc Gen Cnsl, Corp & Sec) • Nina Buff (Dir., Corp. Consolidation & Reporting) • Sharon Mackay (VP, Procurement CTRO & Ops) • Zuzana Robb (Director, Corporate Responsibility)DC_Ruth Elder (Coordinator III, Quality)