

A nighttime cityscape featuring several illuminated skyscrapers. Overlaid on the scene are large, semi-transparent geometric shapes in shades of blue, green, and pink. The shapes include a large blue trapezoid on the left, a green trapezoid on the right, and a large pink trapezoid at the bottom left. The city lights are visible through the gaps in the shapes.

COMMSCOPE®

Code of ethics and
business conduct

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VISION, VALUES AND PURPOSE

At CommScope, we understand what unifies us and makes us unique. A clear vision and meaningful values guide our strategic business decisions, strengthen our brand and enable us to provide advanced infrastructure solutions.

Our vision

“We push the boundaries of technology to create the world’s most advanced networks.”

Our values

Act with integrity	Our integrity is our moral compass, our core belief in doing the right thing. We find purpose and success through our uncompromising commitment toward our customers, partners and each other. We demonstrate candor, trust, respect, authenticity, honesty and accountability in everything we do.
Innovate for customer success	Our customers look to us as enablers of their success. We innovate with their needs in mind. Our end-to-end network expertise and commitment to our promises build the trust that drives deeper engagement and secures our ongoing success.
Continuously improve	Challenge the status quo! A meticulous pursuit of betterment sets us apart by making decisions faster, responding to our customers quicker and being more opportunistic. Embrace challenges, criticism and diversity in thought as the basis for improvement for ourselves, our customers, our communities and our planet.
Win as one team	Always together, never alone. Part of what makes us unique is our diverse set of experiences and perspectives, which provide a uniquely strong support system. Always there for our colleagues, we work together, across borders and boundaries, toward a singular goal—to win.

Our purpose

“We create lasting connections”

Message from the CEO

Dear fellow employees:

Every day, we make decisions at CommScope that are critical to our success. Common sense and good judgment help us make the right choice in most situations. When the choice is not clear cut, our Code of Ethics and Business Conduct (the Code) is a practical reference that will help you make the right decision, even if it is not the easy one.

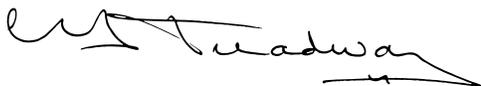
As our vision and values make clear, CommScope is committed to integrity and the highest ethical standards. Our Code provides a framework to make sure our decisions reflect and promote the principles that are at the core of our business. These principles guide us in everything we do and remind us to set a good example for ourselves and others.

Our reputation for integrity is a valued asset. Each of us has a personal responsibility to safeguard our reputation through fair, honest and ethical conduct in all of our business activities. It all circles back to making choices you and your family can be proud of. It's not just a program or an initiative. It's woven into our company's culture: Do the right thing. Treat everyone with high respect and regard. As our founder has always said, "Nothing sells like the truth."

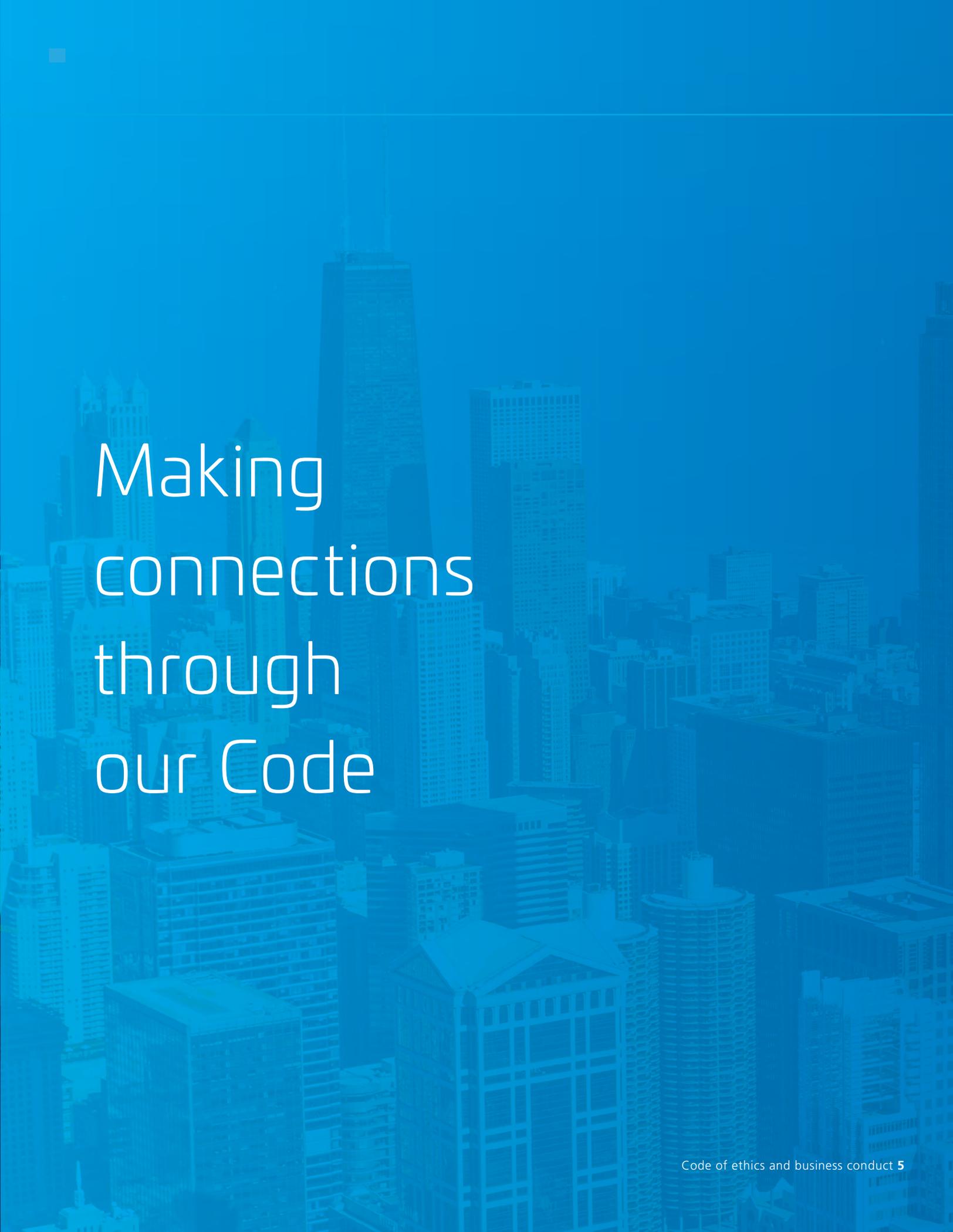
Take some time to read and understand the Code and consider how it connects to your work. You should also refer to the Code for resources you can use if you have questions or need guidance in making the right decisions.

You can be sure that your management team and the CommScope board of directors are committed to the principles in the Code. We are also counting on each of you to continue to demonstrate your commitment to the same high standards in your daily work lives. Our reputation depends on it.

Chuck Treadway
President and Chief Executive Officer



We operate with integrity to deliver strategic growth opportunities for our customers, value to our stockholders, and a thriving, collaborative culture for our diverse employees.

An aerial view of a city skyline, likely New York City, with a prominent blue overlay. The text is centered in the upper half of the image.

Making connections through our Code

Our commitment to compliance and ethics

The CommScope¹ Code of Ethics and Business Conduct (the Code) summarizes many of the basic rules that apply to our business. It describes our commitment to comply with the letter and spirit of applicable laws and to connect with each other and everyone with whom we do business with honesty, integrity and mutual respect. It also describes resources you can use if you have questions or concerns about legal compliance or ethics at CommScope.

The Code applies to all CommScope employees and officers. It applies to all we do, everywhere we do business. We also expect our business associates—including vendors, channel partners, agents, consultants and other service providers—to comply with the standards described in the Code.

As a global company headquartered in the United States, some of our activities are regulated by U.S. laws in addition to local laws and the laws of other countries where we do business. If you are not sure which laws or policies apply, or you think there may be a conflict between the laws that apply or between local laws and our policies, ask your supervisor or manager or use any of our other ethics and compliance resources listed in the resource summary on page 39 of the code. Regardless of where you are located, we all operate with the same ethical standards.



Our responsibilities under the Code

Responsibilities of employees and business associates

- Be familiar with and comply with the Code, our corporate policies and the laws and specific policies that apply to your job.
- Act in a professional, honest and ethical manner in your work on behalf of CommScope.
- Ask for help when you have questions or concerns about ethics or compliance or you are not sure what you should do in a specific situation.
- Be alert for situations that could lead to a violation of the Code and promptly report actual or suspected misconduct to your supervisor or manager or use our other ethics and compliance resources².
- Complete required compliance and ethics training and certifications.

¹ References to CommScope or the company include CommScope Holding company, Inc., and all of our subsidiaries and affiliates.

² If the laws of your country prohibit the company from requiring you to report violations of law or the Code, you are still encouraged to report these violations even if you are not obligated to do so.

Additional responsibilities of supervisors and managers

- Serve as a role model, encouraging ethical conduct by example.
- Help your team comply with the Code and our policies. Provide guidance on the Code and the companies expectations relating to compliance with our company guidelines, policies and procedures. Provide training if necessary.
- Promote an open work environment where employees are comfortable raising questions and concerns without fear of retaliation.
- Review questions and reports you have or receive about the Code with your managers or the appropriate business leaders; report possible violations of laws or the Code to the Legal department and/or our other ethics and compliance resources; and make sure the issues are addressed.

Following the Code is not optional. If you violate the Code or any other policy or procedure, you could be subject to the full range of disciplinary actions, including dismissal and, in some cases, civil or criminal penalties.

Making ethical decisions

We make many decisions in our jobs. Many of them are routine. But you may find yourself in a situation where the choices are difficult or where something seems unethical or improper.

The Code provides guidelines for you to use in handling many issues that may come up in your work. It cannot, however, answer every question or address every situation. If you cannot find an answer in the Code or other applicable policies, use the checklist on this page to think through your options and decide the best course of action for you, the company, your co-workers and anyone with whom we do business.



Thinking it through...

- Check to see if you have the facts you need to understand the issues
- Think about the options and the possible consequences
- Ask yourself:
 - › Do I have the authority to make a decision?
 - › Should I consult with others who might be affected before I act?
 - › Would the action violate any law or regulation?
 - › Is it appropriate, honest and consistent with CommScope values?
 - › Would it damage the company's reputation?
 - › Would I be comfortable telling my boss about my decision or action?
 - › How would I feel if I saw a report about my actions in the news or on the internet?
 - › How would I feel if my family knew about the situation and what I chose to do?

In most cases, if something seems unethical or improper, it probably is. But, if you are still not sure what you should do, consult with your supervisor or manager or use the other ethics and compliance resources. The company encourages you to seek answers before taking any action that you suspect may be a violation of the Code. Keep asking questions until you are sure you are doing the right thing.

Don't miss the warning signs....

You might hear someone say something that suggests something might be wrong—or you might be thinking the same thing. Like:

- It's no big deal. No one will notice.
- Nothing's going to go wrong.
- It's not my job. It's not my problem. Someone else will figure it out.
- Don't worry about it. We need to make our numbers.
- Everybody else does it.

Be alert to these warning signs. If you think something is wrong, you need to speak up.



Asking questions and raising concerns—our ethics and compliance resources

If you have questions or concerns about the Code or legal compliance and ethics at CommScope:

- Contact
 - › Your supervisor or manager
 - › Your local Human Resources department or the corporate Human Resources department
 - › Your Facility Ethics Officer or the Corporate ethics officer or
 - › The Legal department
- Send an email to ethics@commscope.com.
- Use CommAlert™, a telephone line and website managed by an independent third-party that is available 24 hours a day, 7 days a week. When using CommAlert you do not have to give your name where legally permitted, but you should provide enough information to allow the company to conduct a thorough investigation. Local laws may limit the types of actions you can report using CommAlert.

You can also submit concerns about CommScope's accounting, internal accounting controls or auditing matters to the audit committee of the company's board of directors. You may write to the audit committee at the company's corporate headquarters, attention Corporate Secretary.

You will find contact information for our Ethics and compliance resources in the resource summary on [page 39](#) of the Code and on the [company's public internet site](#). The Code is also available on our public internet site.

Confidentiality and protection from retaliation

The company takes all requests for help and reports about actual or suspected misconduct seriously. Your question or report will be handled promptly and confidentially to the extent possible. You must be honest and transparent and cooperate fully in internal investigations. If substantiated, reports will be resolved through appropriate corrective action.

The company will not tolerate retaliation in any form against employees who raise concerns or make reports about actual or suspected Code violations in good faith. "Good faith" simply means that you believe that the information you are reporting is true. You must never make a report you know is false or misleading. You should report concerns about retaliation immediately to Human Resources, your Facility Ethics Officer or the Corporate Ethics Officer for appropriate action.



For example...

Q: I filed a report with my Facility Ethics Officer and a co-worker was disciplined as a result. I was just moved off of the team and my boss told me that I am a troublemaker. Is that retaliation?

A: Retaliation for raising concerns about ethics and compliance in good faith will not be tolerated. Contact your Facility Ethics Officer or the Corporate Ethics Officer as soon as possible. They will take your concern seriously and investigate. The decision to change your team, and your supervisor's comment, might be unrelated to your original report. If they are related and the action and comment were retaliatory, however, your supervisor could be subject to disciplinary measures.

Waivers

In extremely limited circumstances and where legally permitted, CommScope may find it appropriate to waive a provision of the Code. Any waiver for executive officers or directors must be approved by the company's board of directors and will be promptly disclosed to shareholders where required. Any other waiver must be approved by the company's CEO.



CommAlert

In the U.S., dial 866-277-2410. Calls from outside the U.S. require a country-specific code which you can find on the [company's public internet site](#).

You can also visit <https://commalert.alertline.com> or, for locations in the EU, <https://commalert-europe.alertline.com>, to report a concern.

A close-up photograph of a person's hands working on a network switch. The person is wearing a white lab coat. The hands are carefully handling a bundle of fiber optic cables. The background shows a rack of network equipment with many ports. The entire image is overlaid with a semi-transparent blue filter.

Making connections through integrity

We follow the letter and spirit of the law

No bribery or corruption

What to know

At CommScope, we have a zero-tolerance policy toward bribery, corruption, extortion and embezzlement. We prohibit bribery by employees and anyone acting on our behalf. Our policy applies to all we do, everywhere we do business—regardless of local custom or practice.

What to do

- Know and follow our anti-corruption policies and all relevant anti-corruption laws. Remember that many anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010, have severe penalties and apply wherever we do business.
- Never offer, give or promise anything of value (no matter how small) to influence a business decision or get or keep a business advantage.
- Never ask for or accept a bribe—even if you do not intend to follow through.
- Use care and know and follow our policies and procedures on retaining third-party business associates, including the company's due diligence requirements. Properly supervise third-party business associates' activities.
- Make sure that all payments, benefits or favors are fully, honestly and accurately reflected in the company's books and records. Never attempt to conceal or misrepresent a payment or expenditure.
- Contact the Legal department for guidance if you have any questions or concerns about the bribery laws or our policies or whether a gift or payment would be unlawful or inappropriate.



TELL ME MORE...

By “bribe,” we mean offering (or accepting) anything of value for the purpose of influencing a business decision or securing any kind of improper advantage. A bribe is not just a suitcase of cash. Bribes may also include:

- Gifts, especially gifts that are expensive
- Entertainment, hospitality and travel where there is no clear business purpose or they are beyond reasonable business needs
- Personal services, favors or loans
- Charitable or political contributions
- Payments or benefits to, or services for, an individual's family members
- Providing payments or benefits or services to a “facilitator,” including kickbacks



For example...

Q: A government customer wants to visit our facility for a product demonstration. Are there any issues?

A: Yes. The bribery laws are often more strict when you are working with government officials. You will need to review the proposed visit and your specific plans, including any business courtesies you may want to provide, with the Legal department to make sure that they comply with our policies and all applicable laws. Our Anti-corruption Policy includes specific requirements and guidelines.

At CommScope, we have a zero-tolerance policy toward bribery and corruption.

Don't miss the warning signs....

If you want to use a third-party or agent to work on the company's behalf, be alert for warning signs that a bribe is expected or may be made, such as:

- The country where the transaction is taking place has a history of corruption
- The third-party or agent:
 - › Will interact with governmental officials
 - › Was specifically recommended by a government official
 - › Provides inaccurate or incomplete information in expense or accounting records or other requested or required disclosures
 - › Does not cooperate with the company's third-party due diligence process or provides incomplete and/or inaccurate answers during the process
 - › Refuses to certify that they will not violate anti-corruption laws
 - › Seems unqualified or lacks the resources needed to perform the services offered so that it seems the only qualification they have is influence over government officials
 - › Has undisclosed business partners or associates with whom fees or commissions are split
 - › Asks for commissions or fees that are unusually high
 - › Requests cash payments or provides payment instructions or requests that are unusual; for example, the person asks you to make the payment to someone else or in some other country



Fair competition

What to know

We sell our products and services strictly on their merits, based on price, terms and quality, and comply with the laws that regulate competition.

What to do

- Become familiar with the company's [Antitrust and Competition Law Compliance Policy](#).
- Do not enter into any understanding or agreement with a competitor that might affect prices, terms on which products or services are sold, or the number and type of products or services sold.
- Never discuss prices, pricing strategies, product planning, marketing or terms of sale with a competitor.
- Do not get involved in an understanding, agreement or practice that prohibits discounting or sets a fixed or minimum resale price for CommScope products.
- Never try to influence, pressure or incentivize our distributors or other business associates to price at or above recommended levels.
- Do not engage in discriminatory pricing practices or impose discriminatory terms and conditions of sale that violate applicable laws.
- Always collect information about competitors and competition through public sources and other lawful channels. Never engage in misrepresentation, deception, theft, spying or other illegal means to gather competitive intelligence or ask employees of competitors to violate their confidentiality obligations.
- Contact the Legal department for guidance if you witness behavior that you believe is inappropriate or you have antitrust or competition questions or concerns.



For example...

Q: My manager has asked me to attend an industry trade association meeting next week. Obviously, many actual and potential competitors will be there. Are there areas that I cannot discuss at the meeting?

A: Since the purpose of an industry trade association meeting, and meetings of industry standards groups, is interaction with competitors, you need to be careful in all your contacts at the meeting. Never discuss prices, costs, sales, profits, market shares or other competitive subjects, even during informal or social gatherings. If those matters come up, stop the discussion immediately, leave the meeting or social gathering in a way that will be remembered (for example, clearly spell out to the group your concerns about the discussion and state that you feel compelled to leave the meeting) and notify the Legal department as soon as you can.



TELL ME MORE...

Not all exports are obvious. Shipping a product across national borders is an export but other activities can also constitute an export:

- Posting technical information on a website
- Emailing information or technology across national borders—even to another CommScope employee
- Sharing technical information with a non-U.S. national in your office in the United States
- Traveling outside the U.S. with products or technology—including laptops, operating software and technical data

Trade controls

What to know

We are committed to complying with the laws and regulations that cover our imports and exports of goods, software, technology, technical data and services across national borders, including laws covering international boycotts. To avoid inadvertent violations, and as part of our corporate responsibility, we comply with the U.S. laws that restrict our dealings with certain countries, persons, groups and organizations wherever we do business.

To meet these objectives, we must understand and honestly and transparently report what we are importing or exporting, where and to whom it is going, and how it will be used.

What to do

- Know and follow the trade compliance laws and regulations that apply to your work, keeping in mind that the rules are complex and often change.
- Know and follow CommScope's policies relating to imports, exports and other trade issues.
- Get the required licenses and approvals before exporting or importing products, software, technology, technical data or services and comply with any restrictions on:
 - › Our dealings with specific countries, people, groups and organizations—including travel to or through certain countries.
 - › Sales of products, technologies and/or services that depend on their intended use and users.

- Never participate in a trade boycott of a country “friendly” to the United States that the U.S. government has not officially approved, such as the Arab League of Nation’s boycott of Israel. Be alert for—and contact the Global Trade Compliance department immediately if you receive—language relating to these boycotts or a boycotted country in an email, request for proposals, purchase order, shipping documents or other trade documents.
- Since trade restrictions can change, check with the Legal department or the Global Trade Compliance department before doing business in a country in which we have not recently done business.



Don't miss the warning signs....

Be alert to warning signs that indicate a trade violation is about to occur:

- Requests to change shipment destinations when a concern is raised
- Referrals to distributors or other third parties when questions come up
- Where the context is confusing—for example, where the named end user would have no use for the item being shipped
- Where the end use is not completely clear—for example, when the shipment is to a research facility that could use the item for a prohibited end use



Not all exports are obvious.



Special rules apply when we do business with the defense industry or with governments, government agencies and government-owned businesses.

Government contracting

What to know

While we act with the highest level of integrity and honesty with all customers, we must also comply with the special rules that apply when we do business with the defense industry or with governments, government agencies and government-owned businesses.

What to do

- Understand and comply with the laws and policies that apply to your work on government contracts.
- Never ask for or use another company's bid or proposal information or non-public government source selection information before the award of the government contract.
- Never offer or provide gifts, gratuities or entertainment to a government client without prior written approval of the Legal department. Also see the sections of the Code on gifts and entertainment and our anti-corruption policies.
- Strictly follow the specific requirements of each contract and the laws and regulations referenced in each contract and make sure we pass through to subcontractors the required government contract provisions.
- Make sure that all goods and services provided to a government conform to the contract's specifications, unless the proper government authority has specifically approved the change.
- Always be truthful, accurate and complete in all representations and certifications.
- Ensure that all costs are properly and accurately charged and recorded, including proper time charging for hours worked.
- Never discuss employment or consulting opportunities with a current or former government employee without first consulting the Legal department.
- Immediately disclose to the Legal department any suspected violation of law involving fraud, conflict of interest, bribery, inappropriate gifts or gratuities or any misrepresentation or improper invoicing in connection with a government contract.

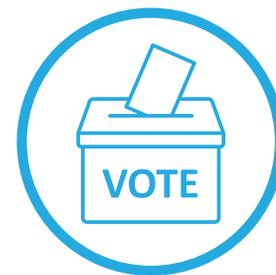
Political activities and lobbying

What to know

At CommScope, we encourage our employees to participate in civic and political activities on their own time. The company may also wish to promote our interests at various levels of government from time to time. We are committed to complying with the many laws that regulate our political activities and the contacts we may have with legislators, public officials or others to influence legislation or administrative actions.

What to do

- Make sure that your personal political activities are done on your own time, with your own resources, and do not use any CommScope property or facility for your own, personal political activities.
- Never suggest that CommScope supports your personal political views.
- Where corporate political contributions are permitted, understand that CommScope will not fund or support any political party or official or any candidate for public office without the prior approval of the General Counsel.
- If your work involves contacts with legislators, public officials or others to influence legislation or administrative actions, contact the Legal department to determine whether disclosure or other rules apply and comply with all approval, reporting and other requirements.



We are committed to complying with the many laws that regulate our political activities.



Responding to government requests

What to know

We cooperate fully and appropriately with government requests and investigations.

What to do

- If you receive a government inquiry or request for information or documents that is outside the routine course of your job, contact the Legal department as soon as possible.
- Always provide accurate and truthful information in response to government requests and inquiries and never try to obstruct its requests for information.

We conduct business honestly, transparently and fairly

Building honest and fair relationships with customers and suppliers

What to know

Maintaining our reputation for fair, honest and ethical conduct in all of our business activities is critical to our success. We do not engage in dishonest, unethical or illegal activity to win business.

What to do

- Be honest in your communications about our products and services. Comparisons with competitive products and services must be balanced, accurate and verifiable.
- Base your decisions to buy goods or services for CommScope on the best value for CommScope, looking at quality, service and price, the business benefits to the company and our customers and the supplier's business practices, including corporate responsibility and sustainability practices. Speak up if you suspect a supplier is not complying with our standards.
- Never use your position at CommScope to get personal benefits from a current or prospective supplier.
- Ensure that your conduct is free from any potential conflict of interest that might impact the decisions you make on the company's behalf.



TELL ME MORE...

The following are just a few examples of situations where a conflict of interest may arise:

- A close family member or close friend works for an organization that does business or wants to do business with CommScope or competes with us, even if they do not get paid to do so.
- Your outside work or other activities—including service on the board of another organization—might interfere with your work at CommScope or could harm or embarrass the company.
- You use company resources for your personal benefit or for the personal benefit of someone else.
- You have, or a close family member has, an investment or financial interest in a competitor, customer, supplier or other business partner of CommScope. Owning stock in a publicly traded company that is not material to you will usually not be a conflict of interest.
- You supervise or are supervised (directly or indirectly) by a family member or close friend.
- You are offered a gift or entertainment that is excessive or that might influence—or appear to influence—your business decisions.

Avoiding conflicts of interest

What to know

Each of us has a personal responsibility to act in the best interests of our company. We must avoid situations where our personal interests, relationships or activities interfere—or appear to interfere—with our work for CommScope or make it difficult to perform our work fairly and objectively. While many conflicts of interest can be resolved in a mutually acceptable way, full disclosure must be made at the earliest possible time to protect you and the company.

What to do

- Become familiar with the company's [Conflict of interest Policy](#).
- Be transparent about your outside activities and relationships and watch for situations where they might interfere with your work or make it difficult for you to be objective.
- Do not use your position at CommScope to benefit yourself or your friends or family members.
- Never pursue (for yourself or others) business or corporate opportunities that you learned about in your work for CommScope or through the use of company property or information.
- If you think you face an actual or potential conflict of interest, formally disclose the actual or potential conflict of interest to your manager, who can work to resolve the conflict following the requirements in the [Conflict of interest Policy](#).



For example...

Q: A member of my family wants to do business with CommScope. Her company's bid is going to another department and I will not be involved in deciding whether to accept the bid. Do I need to do anything?

A: Yes. Even though you do not have any direct control over the decision to accept the contract, the fact that your family member works for the company that is making the bid could create the appearance of a conflict of interest and should be formally disclosed as directed by the company's conflicts of interest policy. It is possible that no further action will be required. In any case, you need to make sure that you do not try to influence.



Thinking it through...

Conflicts of interest are not always obvious. If you face a situation where it looks like a conflict of interest may exist, ask yourself the following questions:

- Would the situation—or the relationship—affect my decisions at CommScope?
- Would it make me feel an obligation to put my personal interests – or the interests of someone close to me—ahead of the company's?
- Would I be embarrassed if someone at CommScope knew all the facts?
- Do I—or does someone close to me—gain anything from my potentially divided loyalty?
- Would other people think that the situation—or the relationship—might affect how I do my job?
- Would a customer or supplier wonder if we had treated them fairly?

We must avoid situations where our personal interests, relationships or activities interfere—or appear to interfere—with our work for CommScope.



TELL ME MORE...

As a rule of thumb, an occasional gift of a promotional item or an item with a nominal value is generally allowed. You should refer to our global travel and entertainment policy, anti-corruption policies, and other applicable policies for specific limitations

On the other hand, it is against CommScope policy to offer or accept any gift or entertainment that is:

- In cash or a cash equivalent like gift cards or gift certificates
- Offered as a “quid pro quo” (offered for something in return)
- Lavish or extravagant
- Likely to reflect negatively on our reputation
- In violation of applicable law or the policies of the giver or the recipient

Appropriate gifts and hospitality

What to know

Appropriate gifts and business-related entertainment (including meals) can build goodwill and help develop business relationships. But they can also raise questions about our personal integrity or appear to create an unfair business advantage. Because of this, we must always use good judgment when deciding whether to offer or accept a gift or business-related entertainment.

What to do

- Follow these general guidelines to avoid both real or perceived concerns about the gifts and entertainment we give or accept:
 - › Do not solicit gifts or entertainment.
 - › Know and follow the local laws, codes and policies that apply.
 - › Never offer or accept any gift or entertainment that is intended to create an obligation or influence or reward a business decision or that could be perceived as a bribe or a payoff.
 - › Make sure that any gift or entertainment you offer or accept is infrequent, reasonable, customary and not excessive in the locations involved.
 - › Ensure that any gift or entertainment you offer does not cause the recipient to violate their company’s policies or procedures.
 - › Avoid inappropriate or culturally insensitive forms of gifts or entertainment.
- Review and comply with the prior approval requirements, limitations, value amounts and exclusions in our global travel and entertainment Policy, anti- corruption policies and any other policies that apply.
- Remember that even modest gifts or entertainment are prohibited in some situations. For example, additional approvals are required before offering **anything** of any value to anyone performing a government function, a political candidate or a manager or employee of a state-owned business unless our corporate policies specifically permit it.

- Keep accurate and complete records of all gifts or entertainment you give or receive and report the gifts and entertainment you receive from third parties (including suppliers, customers and business partners) to your manager.
- Since it is difficult to state absolute rules for permissible gifts and entertainment, before you offer or accept a gift of greater than nominal value or any business-related entertainment, discuss the facts with your manager, your Facility Ethics Officer, the Corporate Ethics Officer or the Legal department.



Thinking it through...

The following questions can help you decide whether the gift or entertainment is appropriate:

- If you receive a business gift, would you be willing to write a “thank you” note for the gift and send a copy to your supervisor?
- If you offer a gift, would you be uncomfortable if it was disclosed to others or made public?
- Would you be comfortable if pictures were posted on the internet showing you and others enjoying the entertainment event or activity?
- Will your acceptance of the gift or entertainment create a perception that you are not being objective in your business decisions and choices?



For example...

Q: I have been talking with a customer about expanding our business with them. I know she is an avid golfer and I would like to invite her to a golf weekend at a luxury resort she has mentioned to me. I know that we can talk business while on the golf course and during meals and I think it could help us close the deal. Can I do it?

A: No. Although you can offer customers a round of golf in some situations, given the circumstances you describe, including your current discussions about new business, the length of the proposed outing and the luxury resort location, the offer you describe would not be appropriate.

We must always use good judgment when deciding whether to offer or accept a gift or business-related entertainment.



TELL ME MORE...

Some examples of our business records include:

- Manufacturing reports and test results
- Financial reports
- Expense reports
- Invoices
- Time records
- Personnel files
- Business plans



Accurate books and records

What to know

Our books and records must be complete and reliable and accurately reflect the true nature of our transactions and activities. We must never be dishonest or deceptive in the company records we prepare or maintain or attempt to mislead anyone.

What to do

- Be sure the information you prepare, process and analyze is accurate and thorough and complies with applicable laws, accounting principles and company policies.
- Never falsify a record or try to hide or mischaracterize the true nature of our activities.
- Never attempt to bypass any company procedure or control, even if you think it would be harmless or save time.
- Always cooperate with our internal and external auditors and never conceal company information from them.
- Be familiar with and follow company policies and procedures that cover the business records we keep and delete or discard, including any notice from the Legal department that requires you to retain records beyond the normal period.
- Never destroy records to avoid disclosure in legal proceedings or investigations.



For example...

Q: I overheard a co-worker say that he sometimes records sales figures early and files his expense reports late and this helps his team meet their numbers. He said it was OK because it wasn't like he was making the numbers up. I don't think he's right. What should I do?

A: You are right. company policy and the law require us to record all transactions truthfully, accurately and in a timely manner. Recording numbers in the wrong period misrepresents our financial results. You can talk to your co-worker about this or, if you aren't comfortable talking to him directly, discuss the matter with your manager or use our other ethics and compliance resources to raise your concerns.

Accurate and appropriate communications

What to know

CommScope's communications with our stakeholders must be accurate, timely and consistent and comply with applicable legal requirements. Because of this, CommScope has authorized certain individuals—and only those individuals—to communicate publicly on behalf of CommScope and to speak on behalf of the company to the investment community and the media.

What to do

- Avoid making statements where it might appear that you are speaking on the company's behalf.
- Do not make statements that could be interpreted as false or misleading.
- Unless you have been specifically authorized to speak on CommScope's behalf, direct outside inquiries about our business from the media or the investment community to Corporate Communications.



For example...

Q: I am giving a presentation at a conference and I think that news media will be there. Who needs to review and approve my presentation?

A: It depends. Check with your manager who will connect you with the appropriate resources. You may need to have your presentation reviewed by Corporate Communications, the Legal department and others.

We value and protect the assets and resources of the company and others



TELL ME MORE...

CommScope has a formal schedule of authorizations policy that describes who has the authority to approve and sign various types of business arrangements and transactions. This policy applies to all of our transactions worldwide.

- Make sure you have the authority to act before you enter any agreement or sign any contract on the company's behalf.
- Keep in mind that these are minimum requirements and our individual businesses and sites might impose higher standards.
- Check with your manager for guidance, and, if you have any questions, you should contact the Legal department.

Responsible use of assets

What to know

Each of us is personally responsible for protecting company assets and property our customers and business partners entrust to us and making sure they are used appropriately for CommScope's business purposes. company assets include our funds, facilities, equipment (including computers, smart phones and tablets), information and information systems, and intellectual property.

What to do

- Use company assets and the property entrusted to us with care and in compliance with company policies and any applicable agreements.
- Protect these assets against theft, loss, improper access, misuse, damage and waste.
- Do not take or use our assets for personal purposes, without appropriate approvals.
- Never use our assets or systems for activities that are unlawful or unethical or that conflict with the standards and expectations described in the Code and company policies.
- Secure the electronic devices you use in your work for CommScope and avoid any activities that might compromise the integrity of our systems.

- Remember that CommScope owns the information and communication systems you use in your work, and management may monitor and review anything you put on them or send or receive, unless prohibited by local laws.
- Know and follow any additional restrictions in the IT policies that apply to your location since these more restrictive policies control.



For example...

Q: Can I use my CommScope computer or work phone for personal activities?

A: Generally, limited personal use of company resources is permitted so long as it is OK with your supervisor, there is no added cost to CommScope, it does not interfere with your work and your activities do not violate company policies or laws. For example, you may not use company resources in your activities for another organization or business or your personal political activities.

Company assets include our funds, facilities, equipment, information and information systems, and intellectual property.



TELL ME MORE...

Confidential information includes:

- Engineering and other technical data
- Financial data, including actual and projected earnings and sales figures
- Planned new services and products
- Advertising and marketing programs
- Actual and proposed business plans and strategies
- Customer and supplier lists and information, including contract provisions and pricing
- Capital investment plans
- Product configurations, component specifications, logic diagrams and technical drawings
- Test data
- Trade secrets, including methods, programs and processes
- Employee information, including personal information, compensation data and organizational charts

Confidential and proprietary information

What to know

Our confidential information and intellectual property are important business assets that we must preserve and protect. We must also respect the intellectual property rights of others and safeguard confidential information that others entrust to us. Improper use and disclosure can damage our competitive position, impair our business operations and even lead to financial losses.

What to do

- Follow applicable company policies to make sure that our confidential and proprietary information is not misused and that any disclosure is authorized or legally required.
- Do not disclose confidential information to anyone—whether a co-worker, a family member or anyone outside the company—unless you are authorized to do so and the disclosure is required in the conduct of our business.
- Before disclosing confidential information to outsiders, obtain the prior approval from your manager and check to see that any required agreements are in place and followed.
- Do not discuss or use confidential information in places where it can be overheard or seen by those who are not authorized to receive it.
- Follow the policies and procedures that protect the intellectual property rights of the company and others, including specific policies and procedures that cover the proper use of trademarks, service marks and copyrighted material.
- Never use or copy software or licensed information except as permitted under the applicable licensing agreement.
- Remember that your obligation not to disclose or misuse confidential and proprietary information continues after you leave the company, and that all company records in any form must be returned to CommScope unless directed otherwise.
- Dispose of documents that contain confidential information with care so as to avoid inadvertent disclosure.



For example...

Q: A new employee recently joined our team. She used to work for one of our competitors. I'm sure she has valuable information we could use here at CommScope. Are there any issues?

A: Yes. Your co-worker has obligations to her former employer. We must never take or use confidential information or materials that she got in her previous job. For further guidance, discuss your specific questions with your manager or the Legal department.

Privacy and data protection

What to know

CommScope respects the privacy and protects the personal information of employees, customers, suppliers and other business partners. We are committed to complying with all applicable laws and policies that cover our collection, use, transfer and storage of personal information.

What to do

- Know and comply with all applicable privacy and data protection laws, policies and procedures that apply to your job.
- Respect and maintain the confidentiality and security of personal information collected by or for the company at all times.
- Never collect or attempt to access personal information about employees, customers or business partners that you do not need to do your job or keep it longer than it is needed.
- If you have access to personal information, take reasonable precautions to protect it from loss or misuse and from unauthorized access, disclosure, alteration and destruction.



TELL ME MORE...

Personal information is any information that can be used to identify someone and may include:

- Personal addresses and phone numbers
- Government-issued identification numbers, such as Social Security, national insurance or driver's license numbers
- Credit card or other financial account data
- Medical history



TELL ME MORE...

Material non-public information is information that has not been disclosed to the public and that a reasonable investor would likely consider important in deciding to buy or sell a security. Any of the following information may be “material”:

- Actual or projected earnings or financial position
- Significant changes in levels of operations
- Discussions about major transactions such as acquisitions or dispositions
- Awards or cancellations of major contracts
- Development of new products or services
- Changes in strategy
- Significant litigation
- Changes in senior management

As a rule of thumb, if something leads you to want to trade stock or another security, the information is probably material.

Insider trading

What to know

Using material non-public information about CommScope or another company that you learn through your work at CommScope to buy or sell its securities (including stocks, bonds and options) or provide investment “tips” to others violates the company’s policy and may be illegal insider trading. These restrictions apply until the information has been made available to the public and there has been time for the public to digest it.

What to do

- Do not trade in CommScope securities or the securities of any other company based on material non-public information you learn through your work at CommScope.
- Do not share material non-public information with others (including a family member or friend) or simply recommend that they buy or sell securities when you could not trade because you have material non-public information.
- If the Legal department informs you that you are subject to the additional restrictions the company imposes on the trades of our directors, senior officers and certain other employees who have access to material information on a regular basis, know and comply with these additional restrictions.



For example...

Q: One of our customers told me in confidence that her company is working on an acquisition that will greatly expand its markets and opportunities and should have a big impact on the price of the stock of the two companies. Can I buy stock in one of these companies or tell my brother to buy now?

A: No. Never use confidential information that you learn in your job for your personal benefit. Also, the information the customer gave you about her company is probably “material non-public information.” Under insider trading laws and company policy, you must not trade or help others trade in the securities of a company when you have material non-public information about that company.

Material non-public information is information that has not been disclosed to the public and that a reasonable investor would likely consider important in deciding to buy or sell a security.





TELL ME MORE...

This list of best practices should help you protect yourself and the company when you use social media:

- Know the applicable CommScope policies and guidelines
- Be thoughtful about what you are communicating
- Don't share confidential information of CommScope or third parties
- Respect copyright laws (quoting work of others)
- Be professional and respectful of others
- Remember that, if you post it, you own it
- Identify yourself; use first person ("I believe...")
- Don't make statements without factual backup
- Be clear that you are expressing your opinion and not speaking for CommScope where there might be some confusion otherwise

Careful communications and responsible use of social media

What to know

Our reputation is our most important asset. Everything we say and do can potentially strengthen and elevate or damage our reputation. For this reason, we should always be careful and clear in our business communications, including emails, and follow best practices when we use social media.

What to do

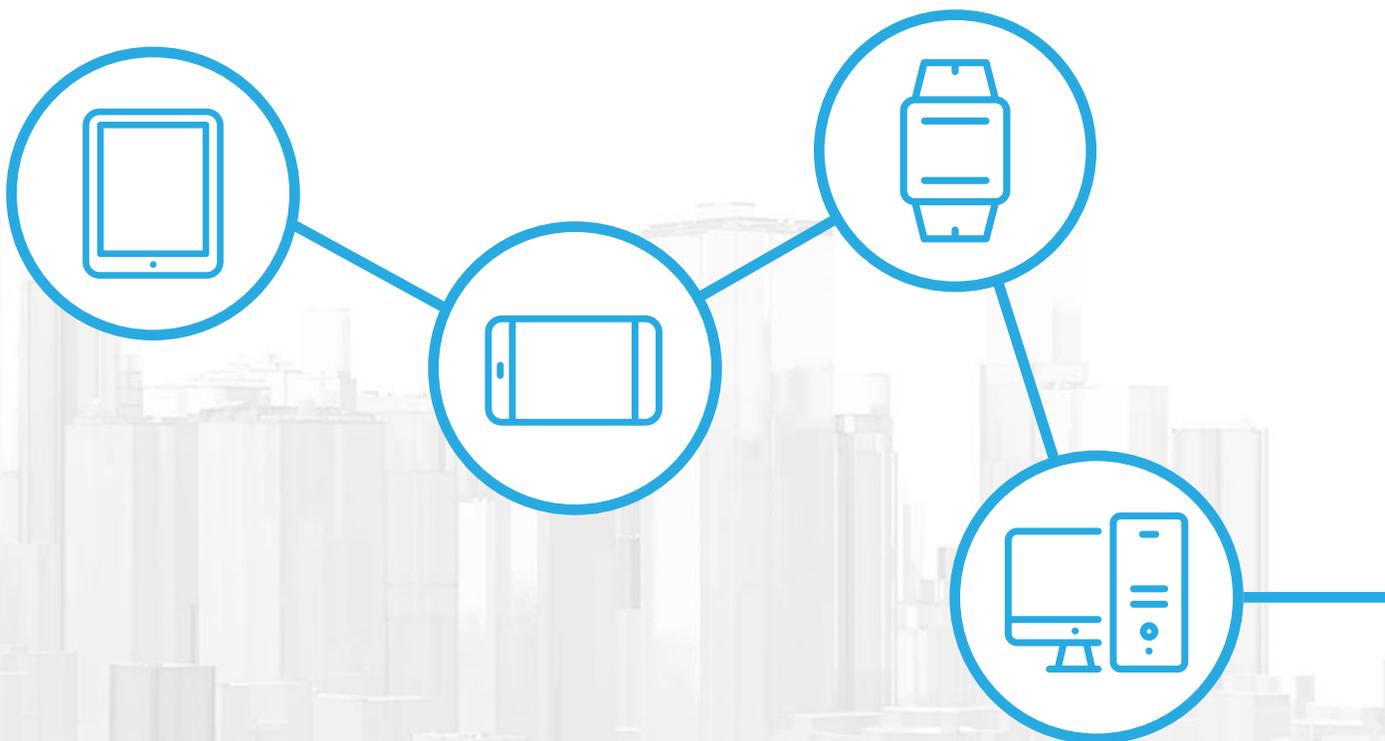
- Use care in all of your communications at CommScope, including emails and texts.
- Assume that all electronic communications are permanent and cannot be erased and that whatever you write might someday become public.
- When you reply to or forward emails, check the email thread to make sure you are not sending confidential or proprietary information to someone who is not authorized to get it.
- If you want to use social media for business purposes, contact Corporate Communications or the Legal department for any required pre-approvals.
- Use good judgment if you use social media for business or personal use. Be especially careful, in your personal use of social media not to engage in conduct that could be attributed to the company.



For example...

Q: Over the weekend, I was in an industry chat room and saw some confidential information that one of our managers had discussed with us at a department meeting. I also found some inaccurate comments about the company's plans and prospects. What can and should I do?

A: Contact your Facility Ethics Officer or the Corporate Ethics Officer as soon as possible to tell them about the confidential information you saw online. Don't respond to the inaccurate information unless you have been explicitly authorized to speak on the company's behalf. Instead, bring it to the attention of Corporate Communications, your facility's ethics officer or the Legal department and they will take the appropriate action.



We care for and respect others



TELL ME MORE...

Our policies, and the laws in many of our locations, prohibit discrimination and harassment based on legally protected characteristics. Depending on the laws of your country, these may include:

- Race
- Color
- Religion
- Gender
- Sexual orientation
- Ethnic origin
- Age
- Military or veteran status
- Marital, familial or civil status
- Pregnancy and maternity
- Disability
- Political affiliation
- Genetic information

Diversity and equal opportunities

What to know

Our culture encourages diversity, intellectual curiosity, creativity, and openness. We value the strength of our differences, provide equal opportunities throughout our business and do not tolerate unlawful discrimination of any kind. We foster a dynamic and inclusive workplace that embraces our diverse employees and experiences and empowers us to deliver superior results for our customers and growth for our company. We provide CommScope employees with opportunities to network, learn, lead, grow careers, support communities and create lasting connections with our customers, partners and suppliers.

What to do

- Know and follow the CommScope labor policy.
- Contribute to an open, honest and supportive work environment that values our different backgrounds and perspectives.
- If you are responsible for hiring, pay decisions, promotions and other employment-related decisions, focus solely on the person's qualifications, abilities, experience and performance.
- Make sure your employment-related decisions are made without regard to any legally protected characteristic except where local law requires us to take affirmative actions to increase employment opportunities for a protected group.

Respect for others

What to know

A great part of our success is grounded in our open, inclusive and collaborative work environment, which helps us achieve excellence and meet the needs of our customers. We are and must be professional and honest with our colleagues, customers and business partners and treat each other with high respect and regard. CommScope will not tolerate harassment of any kind.

What to do

- Remember that unwelcome, insulting or offensive remarks or actions based on an employee's protected status have no place at our company.
- Avoid any actions that someone might interpret as intimidation or bullying.
- Keep sexually-oriented conversations, comments and joking out of the workplace.
- Remember that what you find acceptable or funny may be offensive to others or in other cultures.



For example...

Q: At dinner last night, a customer was making offensive jokes and commented several times on my co-worker's appearance. While she brushed off the comments, I was very uncomfortable. Should I do anything?

A: Yes. CommScope does not tolerate any behavior that creates an intimidating, hostile or offensive work environment. Our policy applies to employees and to anyone who does business with us, including customers. It applies to what we do on company property as well as in off-hours and off-site meetings, including business-related social activities. You should ask your co-worker to report the situation to her manager or to Human Resources. If she does not, you should mention it to your manager and make sure the situation is addressed.



TELL ME MORE...

Harassment is conduct that is intimidating, offensive, demeaning or hostile or that unreasonably interferes with work, such as:

- Jokes or insults about race
- Teasing a colleague about religion
- Disparaging remarks about a country where a co-worker was born or has family
- Sharing unsolicited opinions about people with a particular sexual orientation
- Unwelcome sexual advances or requests
- Sexually-explicit gestures or posters

Safe and secure workplace

What to know

CommScope values our employees' health, safety and well-being, and is committed to providing a safe and secure work environment. Each of us is responsible for our own safety and for the safety of others.

What to do

- Know and follow health and safety rules, policies and procedures at all times.
- Be alert to safety risks in our daily work and report to your manager or other appropriate leadership any accidents and injuries and any unsafe equipment, practices or conditions.
- Never threaten violence or act in a violent way.
- Never use a weapon at work or threaten to do so.
- Do not possess, use or sell illegal drugs when you are working or on company property.
- Know that you will not be allowed to work or represent the company if you are under the influence of any drug, alcohol or any other substance that impairs your ability to work safely and effectively.
- Report any safety or health concerns to your supervisor or any other ethics and compliance resource or local security as soon as possible.
- In emergencies, follow local emergency reporting procedures or contact local authorities.

Protecting the environment

What to know

We are committed to protecting the environment and conducting our business in an environmentally sustainable manner. We are focused on reducing the environmental impacts of our products, sites and manufacturing processes.

What to do

- Be familiar with and follow the environmental regulations, policies, and procedures that apply to your job.
- Dispose of waste materials legally and in a way that meets our environmental standards.
- Strive, in all aspects of our business, to help CommScope minimize our environmental impact by developing products, services and practices that are safe and sustainable.
- Help the company conserve natural resources and prevent pollution whenever possible and make suggestions that could help us in our conservation efforts.



For example...

Q: I have learned that an environmental permit that applies to the processes at one of our facilities has expired. What should I do?

A: Notify your supervisor and plant management immediately. We are required to have all the permits necessary to operate our processes and facilities and to operate in compliance with them. Your plant management will work to fix the problem in an appropriate and responsible way.



Investing in our communities

What to know

At CommScope, we are dedicated to making a positive contribution to the future of both our environment and society. We actively support the communities in which we do business. Through internal programs that provide optimal workplace conditions, rigorous compliance efforts to ensure responsible and fair hiring practices, and philanthropic outreach in the communities where our facilities reside, giving back is a high priority.



What to do

- Value and uphold human rights above all.
- Never engage in modern slavery, including any kind of forced or child labor, in CommScope's business activities.
- Notify the Legal department if you suspect that a supplier or other business partner is using any form of modern slavery, including child labor or forced labor in their activities.
- Help the company identify ways we can continue to support our communities and bring them to the attention of your manager.



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Resource summary

You can find policies and procedures with more detailed information about the topics discussed in the Code on the company's intranet on commscope.sharepoint.com/sites/spectrum or get them from your Facility Ethics Officer.

CommScope encourages you to ask questions or report concerns. We enforce a strict policy prohibiting retaliation for reporting a concern or suspected misconduct in good faith.

To report your concern, please choose any of the following options:

- Contact your supervisor or manager.
- Contact your local Facility Ethics Officer (generally the HR manager at your facility).
- Contact the Corporate Ethics and Compliance Officer or send an email to ethics@commscope.com.
- Submit a confidential report (which can be anonymous where permitted by local law) using CommAlert®:
 - › In the U.S., dial 866-277-2410. Calls from outside the U.S. require a country-specific code. You can find the country-specific code for your location on the company's public internet site at www.commscope.com/corporate-responsibility-and-sustainability/ethics/#reporting-a-concern
 - › Visit <https://commalert.alertline.com> or, for locations in the EU, <https://commalert-europe.alertline.com>, to submit your report.

You can also raise concerns about CommScope's accounting, internal accounting controls or auditing matters to the audit committee at the company's corporate headquarters, attention Corporate Secretary.

We value our reputation for integrity—and we each accept the personal responsibility for maintaining it.

If you have general questions about reporting and non-retaliation, please email ethics@commscope.com.



You can find the contact information for our Ethics and Compliance Resources, including CommAlert, on the company's public internet site at www.commscope.com/corporate-responsibility-and-sustainability/ethics/#reporting-a-concern



[commscope.com](https://www.commscope.com)

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