

# Uniti Group Inc.

## Anti-Bribery and Anti-Corruption Policy

(December 31, 2020)

**Purpose.** Uniti Group Inc. (together with its subsidiaries, the “Company”) is committed to conducting business using ethical and honest means and is therefore committed to implementing and enforcing policies and practices that ensure bribery and corruption, in all forms, are prevented, or if necessary, dealt with swiftly. This Anti-Bribery and Anti-Corruption Policy (the “Policy”) provides standards for compliance with various anti-bribery laws and regulations, including without limitation, the U.S. Foreign Corrupt Practices Act (the “FCPA”) and generally reinforces the Company’s Code of Business Code and Ethics and Whistleblower Policy requirements that its employees and agents act honestly and ethically in all business dealing.

**Scope and Applicability.** This Policy applies to the Company and its employees, officers and directors who act for, or on behalf of, the Company (each a “Covered Party” and collectively, the “Covered Parties”). For the avoidance of doubt, employees, officers and directors of the Company’s subsidiaries are included in the definition of Covered Parties. While certain laws such as the FCPA may apply to bribes or kickbacks offered to governmental officials (both domestic and foreign), this Policy applies all to business relationships and interactions with both governmental and non-governmental persons and entities.

**Bribery and Corruption Generally.** Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object or item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is illegal and its prohibitions are not limited to the act of offering a bribe but also apply to the individual receiving such an offer, if accepted. In addition to direct and indirect payments of money, other examples of prohibited payments include the following if made at the direction, or for the benefit, of a governmental or a commercial business partner or entity:

- gifts, or travel, meals, entertainment or other hospitality expenses;
- contributions to any political party, campaign, candidate for office or party official;
- employment, whether paid or unpaid (e.g., internships); or
- charitable contributions and sponsorships.

Additional information regarding these matters, including the Company’s policies and procedures for requesting and receiving legitimate contributions or gifts can be found in the Company’s Charitable and Political Contributions Policy and its Gifts and Gratuities Policy respectively.

**Company Policy.** Covered Parties have an affirmative obligation to conduct business in a fair and ethical manner, as well as to recognize and report dishonest and fraudulent conduct. The Company has a zero-tolerance policy towards bribery and corruption and acknowledges its affirmative duty to educate Covered Parties on identifying unlawful and corrupt behavior and to empower such persons with the tools and confidence to notify the Company of such unethical actions. Specifically, the Company:

- Prohibits any illegal payment to government officials of any country;

- Prohibits Covered Parties from, directly or indirectly, seeking to influence others by offering, paying or receiving bribes or kickbacks, and from engaging in other behavior that is or reasonably should be considered unethical, illegal or harmful to the Company's reputation for honesty and integrity;
- Prohibits Covered Parties from, directly or indirectly, seeking or obtaining bribes or kickbacks in any form in order to obtain or retain business or gain favorable treatment or advantage;
- Requires Covered Parties to abide by all laws and regulations relating to anti-bribery and anti-corruption in all the jurisdictions in which the Company conducts business, including without limitation, the FCPA;
- Prohibits Covered Parties from offering or making any facilitating payment (i.e., a "grease" payment made to expedite a routine government action that an entity or individual, including a governmental official, is already obligated to perform); and
- Prohibits Covered Parties from engaging with third parties, including without limitation, sales representatives or other intermediaries, while knowing or having reason to suspect that such party is engaging in, or has engaged in, activities, the nature of which are prohibited by this Policy.

**Responsibilities of Covered Parties.** All Covered Parties acting for, or on behalf of, the Company must read and comply with this Policy and are required to avoid any activities that could create, lead to or imply, a breach of this Policy. In the event a Covered Party has reason to believe or suspect that an instance of bribery or corruption has taken, or is likely to take, place such individual must notify the Company as provided herein. A failure to report known or suspected wrongdoing in connection with the Company's business, of which a Covered Party has knowledge may, by itself, subject that individual to disciplinary action up to and including termination of employment. All Covered Parties have a duty, if directed by the Company, to complete training and certify their compliance with this Policy and cooperate in Company investigations, including those involving alleged violations of this Policy.

**Violations.** The conduct and representations made on behalf of the Company may affect its operations and relationship with other stakeholders. As such, the Company requires strict compliance with this Policy as well as all applicable laws and corresponding legal reporting requirements. Violations of this Policy could result in both criminal and civil charges in the United States or abroad, with significant penalties and repercussions. The Company could face civil liability and serious harm to its reputation as a result of violations of this Policy and individuals who engage in behaviors prohibited in this Policy, are subject to disciplinary action by the Company up to and including termination of employment, and for certain violations, may face imprisonment.

**Questions and Reporting.** All questions regarding this Policy should be referred to the General Counsel.

Uniti Group Inc.  
 Attn: General Counsel  
 10802 Executive Center Drive  
 Benton Building, Suite 300  
 Little Rock, AR 72211  
 Daniel.Heard@uniti.com  
 (501) 850-0844

All known or suspected violations of this Policy should be reported to the General Counsel. Any

reports that involve the Chief Executive Officer, Chief Financial Officer or General Counsel will be immediately communicated to the Chairman of the Board of Directors and the Chairman of the Audit Committee. Anonymous inquiries, notifications and reports may be made via email to the Company at [UNIT@openboard.info](mailto:UNIT@openboard.info) or by contacting the Company's ethics hotline at 866-822-6502. Please include "FCPA" or "Anti-bribery" in the subject line.

**Protections against Retaliation.** The Company will not tolerate retaliation against any person who has reported a compliance concern in good faith and will ensure that such individual is not harassed, threatened or penalized in any way for reporting good faith concerns.

\*\*\*\*\*